



NCWA
Northern California Water Association



April 2, 2015

Via e-mail (Tom.Howard@waterboards.ca.gov)

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

Re: 2015 Sacramento River Operations

Dear Mr. Howard:

The Northern California Water Association (NCWA), Sacramento River Settlement Contractors (SRSC), California Rice Commission and Ducks Unlimited respectfully submit these comments regarding the March 30, 2015 “Request from State Water Board to Reclamation for Refined Sacramento River Temperature Modeling Information and a Plan for New Melones Operations to Reasonably Protect Fish and Wildlife” (Request). Please refer to the NCWA letter to you dated March 30, 2015 for additional background information.

We are particularly concerned with Item 2 on page 3 of the Request, which states as follows:

“Modify the scenario labeled “Reclamation March Operations Forecast”, 6b (1) to provide an alternate iteration such that Keswick releases are reduced by 1,200 cfs for April and May as well as the value assumed for Keswick-Wilkins depletion. The distribution of the reduction in depletions between April and May may be modified in consultation with State Water Board staff to evaluate a more realistic alternative as necessary. The results for this scenario should show the same flow at Wilkins Slough as the results submitted on March 26, 2015, under the scenario labeled “Reclamation March Operations Forecast”, 6b (1) and show increased end of September storage in Shasta of approximately +150 TAF or more compared to unmodified 6b (1). No other changes in Shasta releases should be made until October. Two iterations of this run should be provided—one that provides for temperature of 56 degrees and one that provides for a temperature of 57 degrees Fahrenheit at the Clear Creek compliance location throughout the temperature control season.” (Emphasis added.)

Based on the above-quoted request, it appears that the State Water Board is considering action to reduce Sacramento River releases from Keswick by an additional approximately

1,200 cfs in April and May, on top of the reduced releases already assumed under the 6b(1) scenario. While we will address certain legal issues associated with such an action in a separate letter, the principal focus of this letter is the devastating impacts such a reduction would have on the Sacramento Valley—both the farms and the Pacific Flyway. In fact, the reductions in rice planting from this action would have a huge economic impact to our region. These proposed cuts are sudden, inappropriate, disproportionate, and unnecessary.

As indicated in the attached technical memorandum from MBK Engineers, a 1,200 cfs reduction in Keswick releases in April and May would cause a total additional reduction of at least 101,000 acres of planted rice acreage in the Sacramento Valley, above and beyond the reduction expected from the 25% reduction in contract supply for the SRSC. Such a reduction would not only devastate the local farm economy; it would also substantially reduce the amount of water available for wildlife and waterfowl habitat causing significant adverse impacts to the environment of the Sacramento Valley. This would also preclude the possibility of flexible measures such as water transfers from the SRSC. Given the unlikelihood of any significant water transfers from the Feather River watershed this year, the inability to implement transfers from the SRSC will result in further impacts for water suppliers in areas with no surface water supplies this year.

To be clear, reducing Sacramento River flows to this level in April and May would have unreasonable effects on fish, wildlife and other instream beneficial uses, especially during this coming fall and winter when the Central Valley supports one of the highest densities of ducks and geese in the world. In normal water years rice provides up to 50 percent of all the food available to wintering waterfowl in the Central Valley. The food resources that are provided by wetlands are expected to decline by almost half as a result of the current drought. Further reducing planted rice acreages by 101,000 acres will likely result in serious food shortages for waterfowl in the 2015/2016 winter season, as rice is now a cornerstone habitat for ducks and geese in the Central Valley where 95 percent of the original wetlands are gone. Therefore, the magnitude of ricelands habitat reductions resulting from this proposal would be devastating. It is unfathomable that such actions could even be reasonably contemplated without a comprehensive review of these predictable environmental impacts to the millions of waterbirds and other species so reliant upon the ricelands and wetland habitat complex in the Central Valley. In your efforts to benefit fisheries, the environmental impacts to terrestrial habitat and species cannot be ignored.

Importantly, we believe there is a better alternative that will help provide water for both the terrestrial and aquatic environment. As indicated in the March 30, 2015 letter, NCWA and the SRSC are exploring innovative ways to manage water supplies in 2015 for all these beneficial purposes. By fully honoring the settlement contracts, which provide fundamental system-wide stability, we can work creatively under the contracts to meet the various beneficial purposes in the Sacramento Valley (farms, birds, fish), as well as helping with water supply needs in other parts of the state during this critical year. We encourage you to support the plan in the March 30, 2015 letter as the best path forward to serve precious water for farms, birds and fish, which are all closely integrated in the Sacramento Valley. The 1200cfs alternative is simply not necessary or prudent to balance the water for these various beneficial purposes.

We hope this is helpful in our follow-up discussions on these important issues.

Sincerely yours,

A handwritten signature in black ink, appearing to read "David J. Guy".

David J. Guy
President
Northern California Water Association

A handwritten signature in black ink, appearing to read "Paul Buttner".

Paul Buttner
California Rice Commission

A handwritten signature in black ink, appearing to read "Mark E. Biddlecomb".

Mark Biddlecomb
Ducks Unlimited



Water Resources • Flood Control • Water Rights

M E M O R A N D U M

DATE: April 1, 2015
TO: Tom Howard, Executive Director, State Water Resources Control Board
FROM: Marc Van Camp
SUBJECT: 2015 Sacramento River Operations

PURPOSE

The purpose of this memorandum is to identify the potential impacts resulting from your requested modifications to Reclamation's Scenario 6 (b) 1 provided to you on March 26, 2015. Your March 30 request is to reduce the Keswick releases as well as the assumed Keswick-Wilkins depletion by 1,200 cubic feet per second (cfs) in both April and May. The Keswick-Wilkins depletion corresponds closely to the diversions by numerous Sacramento River Settlement (SRS) Contractors, thus a reduction of 1,200 cfs would substantially impact these Contractors' available water supply, diversions, agricultural production, and contractual entitlements as further described below.

INTRODUCTION/BACKGROUND

As you are aware, the SRS Contracts were reduced to a 75% supply in 2014 pursuant to the terms of those contracts. The SRS Contractors worked diligently with Reclamation to coordinate and delay diversions from the Sacramento River to assist Reclamation in its system-wide operations and management of Upper Sacramento River water temperature issues. Also, the SRS Contractors transferred approximately 110,000 acre-feet (AF) in 2014. These water transfers occur due to the certainty of the supply supported by the long-term Settlement Contracts with Reclamation.

The SRS Contractors have again been working diligently with Reclamation to coordinate diversions in 2015. That effort has been focused on the SRS Contractors upstream of Wilkins Slough as a key operational location. These ongoing efforts can be summarized as maintaining a similar April and May volume of diversions as 2014 but on a pattern suggested by Reclamation, which includes lessons learned from 2014. In addition, due to the ongoing drought, the quantity of water being considered for potential transfer in 2015 is more than twice that of last year, approximately 240,000 AF.

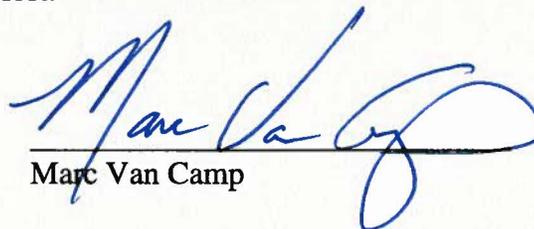
On March 26, Reclamation submitted to you its "Summary of Results – 6(2) Analysis March 2015," which includes a scenario identified as "6 b (1) Reclamation" (hereinafter referred to as Scenario 6 b (1)). Within Scenario 6 b (1), the Keswick-Wilkins depletions (representative of SRS Contractors' diversions) are assumed to be 1,800 cfs in April, and 3,789 cfs in May. Your March 30 request of Reclamation would result in reducing the SRS Contractors' diversions to 600 cfs in April, and to approximately 2,500 cfs in May.

POTENTIAL IMPACTS

Your proposed April and May Keswick-Wilkins depletions and the resulting quantities that would be available for diversion are significantly less than the monthly quantities identified in the SRS Contracts upstream of Wilkins Slough that are to be furnished by Reclamation for diversion by the SRS Contractors. This may result in contractual issues between the parties.

In 2014, the SRS Contractors upstream of Wilkins Slough limited their average April diversions to approximately 600 cfs and May diversions to approximately 4,200 cfs based on the significant coordination with Reclamation, and in part due to precipitation in early April. Although your proposed April Keswick-Wilkins depletion of 600 cfs approximates the SRS Contractors diversion last year, it does not consider the effects of the April 2014 precipitation, which is difficult to quantify. The proposed reduction of May Keswick-Wilkins depletions from approximately 4,200 cfs to 2,500 cfs represents approximately 101,000 AF. A commonly used estimate of the early season water requirement for rice is 1 AF per acre. Therefore, your proposal has the potential to require farming interests within the SRS Contractors to fallow at least 101,000 acres of rice, in addition to fallowing that will occur due to the 25% reduction in SRS Contract supplies. Also, this reduction is for the SRS Contractors only and does not consider the likely reduction of planted acres within the Feather River Settlement Contract area as a result of receiving a 50% supply as compared to 100% supply in 2014.

Creating uncertainty relative to the April and May contract supplies results in significantly unsettled arrangements relative to crop plans and currently proposed water transfers. Without certainty relative to the seasonal and April/May quantities as defined in the SRS Contracts, water transfers are likely to dissipate. Thus, the opportunity to transfer up to 240,000 AF to areas of need will likely be lost.



Marc Van Camp