



Sacramento City-County
Office of Metropolitan
Water Planning

Charlie Hoppin, Chair
Francis Spivey-Weber, Vice Chair
Tam M. Doduc, Member

State Water Resources Control Board
P.O. Box 100
Sacramento, California 95814



April 17, 2012

Re: Supplemental Notice of Preparation and Notice of Scoping Meeting for Environmental Documentation for the Update and Implementation of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary: Comprehensive Review

Dear Chairman Hoppin and Members of the Board:

The Sacramento Water Forum (Water Forum) and its signatories¹ appreciate the opportunity to comment on the scope of the State Water Resources Control Board's (SWRCB) planned update of the Bay-Delta Water Quality Control Plan (WQCP). The Water Forum supports your efforts to protect the water-related resources of the Bay-Delta estuary; however, as part of the SWRCB's consideration of possible revision to the water quality objectives in the WQCP, we urge that the SWRCB include within the scope of its environmental documentation an examination of the potential impacts of any proposed revisions to the water quality objectives on anadromous fish populations in the lower American River (LAR).

As part of meeting the coequal goals of the Water Forum Agreement, the Water Forum has been working in coordination with the U.S. Bureau of Reclamation, the California Department of Fish and Game, National Marine Fisheries Service and the U.S. Fish and Wildlife Service in developing a flow management standard that provides an improved pattern of fishery flows releases from Folsom Reservoir. Collectively, we have developed a science-based flow management standard (FMS) that provides both appropriate flows and water temperatures to protect and enhance important aquatic

¹ The Water Forum is a stakeholder organization representing over 40 business, environmental, public, and water interests in the Sacramento region. Through execution of the Water Forum Agreement in April 2000, members agreed to a series of actions to achieve the following coequal 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.

species, including steelhead (*Oncorhynchus mykiss*) and fall-run Chinook salmon (*Oncorhynchus tshawytscha*).

A review of the historical operations of Folsom Reservoir demonstrate that it is often used as a “real-time, first response facility” for meeting various Delta water quality objectives and demands. Utilizing Folsom Reservoir as a real-time first response facility results in redirected impacts on LAR salmonids by affecting river flow and water temperatures during several life stages of steelhead, a federally listed species under the Endangered Species Act, and fall-run Chinook salmon. It also impacts water supply in Folsom Reservoir. More specifically, these redirected impacts include: (1) redd dewatering; (2) fry stranding; (3) juvenile isolation; (4) depletion of Folsom Reservoir cold-water pool; and (5) depletion of Folsom Reservoir water storage. Water temperatures needed to protect steelhead and fall-run Chinook salmon are difficult to achieve in the LAR and require careful management of the cold-water storage in Folsom Reservoir. As demonstrated by the attached graph reflecting Folsom Reservoir’s isothermobath, the reservoir’s cold-water pool undergoes a dramatic intra-annual transition from colder temperatures in the winter/early spring months (December-April) to much warmer temperatures in the later spring, summer and fall months (May-November). Analysis done by the Water Forum demonstrates significant improvement in water temperatures for rearing juvenile steelhead and spawning fall-run Chinook salmon is achieved through implementation of the FMS water temperature management program.

Reclamation has been operating consistent with the FMS since 2006. In 2009, National Marine Fisheries Service incorporated the FMS into its OCAP biological opinion. A summary of the FMS can be found in Appendix 2-D of the biological opinion. A change in water quality objectives, or their implementation, that results in depletions in Folsom storage reduces the coldwater pool available for management of water temperatures in the LAR. Elevated water temperatures during summer and early fall months would be expected to increase salmonid disease susceptibility and transmission as well as result in environmental conditions conducive to increased predation. The FMS was developed to balance the need to protect the LAR’s important fishery, wildlife, recreational and aesthetic values with the need to provide the three-county Sacramento region with a safe and reliable water supply. Reliable surface water supplies have enabled Water Forum members to implement conjunctive use, which has become increasingly important in light of regional groundwater contamination. Increased groundwater pumping, triggered by reductions in surface water supplies, further mobilizes the contamination plume, thereby exacerbating the groundwater contamination problem.

Accordingly, as your staff analyzes various alternatives to Delta water management, the Water Forum requests that the analysis fully investigate potential impacts to the combined flow and temperature approach of the LAR FMS and that the SWRCB's environmental document disclose the effects of any proposed changes to the WQCP, including implementation, on the following resources:

1. Streamflows and water temperatures for the protection and preservation of anadromous fish in the LAR;
2. Water supplies in Sacramento, Placer and El Dorado counties;
3. Groundwater aquifers, including further groundwater contamination in the three-county Sacramento region;
4. Hydroelectric generation;
5. Recreational resources in the LAR;
6. Recreational resources in Folsom Reservoir and the upper American River watershed.

We believe that due consideration of the resources in Delta tributaries, such as the LAR, is a vital component of your analysis. Not only are Delta tributaries unique and valuable ecosystems in and of themselves, but they are inherently linked to the complex ecology of the Delta, particularly its anadromous fisheries.

The Water Forum has engaged in conversation with staff of your Water Rights Division on the approach and benefits of the LAR FMS. We welcome the opportunity to continue meaningful dialogue on these topics.

Sincerely,



Tom Gohring
Executive Director

Attachments:

1. Folsom Reservoir Isothermobaths
2. List of Water Forum Signatories

Attachment 2

Water Forum Agreement Signatories

Business Interests

Associated General Contractors
Building Industry Association of Superior California
Sacramento Association of Realtors
Sacramento Metropolitan Chamber of Commerce
Sacramento-Sierra Building and Construction Trades Council

Environmental Interests

Environmental Council of Sacramento
Friends of the River
Friends of the River
Save the American River Association

Public Interests

City of Sacramento
County of Sacramento
League of Women Voters of Sacramento
Sacramento County Alliance of Neighborhoods
Sacramento County Taxpayers League
Sacramento Municipal Utility District

Water Interests

Carmichael Water District
California-American Water Company
City of Folsom
City of Roseville
City of Sacramento
Del Paso Manor Water District
Golden State Water Company
Natomas Central Mutual Water Company
Rio Linda / Elverta Community Water District
Sacramento Suburban Water District
San Juan Water District
El Dorado County Water Agency
Placer County Water Agency
El Dorado Irrigation District
Georgetown Divide Public Utility District
Sacramento County Farm Bureau
Orange Vale Water Company
Rancho Murieta Community Services District
Citrus Heights Water District
Fair Oaks Water District
Florin County Water District
Regional Water Authority
Clay Water District
Galt Irrigation District
Omochumne-Hartnell Water District