

**Northern California Power Agency**

180 Cirby Way, Roseville California 95678

**MICHAEL W. McDONALD**

General Manager

(916)781-3636

**NCPA's Comments to the Third Workshop  
of the State Water Resources Control Board (SWRCB)  
on Bay/Delta Water Quality Standards**

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Chairman Caffrey and Members of the Board, I am pleased once again to have this opportunity to present comments to the Board's Third Workshop on Bay/Delta Water Quality Standards. My comments are presented on behalf of the Northern California Power Agency (NCPA). In preparing them, we have worked closely with Western Area Power Administration and other municipal electric utilities, including Sacramento Municipal Utilities District. NCPA, the organization I represent, is a nonprofit, California Joint Action Agency whose membership consists of 11 municipal electric utilities, Plumas-Sierra Rural Electric Cooperative, Turlock Irrigation District, and Truckee-Donner Public Utility District. NCPA's members collectively supply electric power to over 600,000 residential and business consumers throughout Northern California. The largest share of this power is produced by the federal Central Valley Project (CVP) and marketed by Western Area Power Administration (Western) to NCPA members and other preference customers in northern California. In addition, several NCPA members own and operate hydroelectric facilities located elsewhere in and surrounding the Central Valley.

As I noted at the Board's last workshop on May 16, hydroelectric generation is an extremely valuable resource that makes important contributions to the economy and environment of northern California. Clean, renewable hydroelectric energy is the third largest source of electricity in northern California, behind only natural gas and nuclear power generation. The CVP produced 3.5 billion kilowatt-hours of hydroelectric power in Fiscal Year 1993, equivalent to the annual energy consumption of 450,000 northern California homes.

CVP power users make a major contribution to the federal government. In addition to annual O&M costs, CVP power customers are responsible for repaying \$560 million of CVP construction costs, roughly 20 percent of the total cost of constructing CVP project facilities. These facilities provide multifaceted benefits to the California economy.

In addition, CVP power users will contribute nearly \$8 million toward the fish and wildlife restoration measures authorized by the Central Valley Project Improvement Act in Fiscal Year 1994. These funds support environmental measures that will provide important benefits to the aquatic resources of the Bay/Delta. Restoration Fund Surcharges on CVP power users will be temporarily doubled in Fiscal Year 1995 to make up for expected deficiencies in payments by water users and permit other vital fish and wildlife improvement work to begin.

Preserving the economic and environmental benefits of CVP hydroelectric power is critical to the continued vitality of northern California. Therefore, we strongly believe that the Board adopt an integrated approach that balances the many uses of this key watershed, including its use for power generation.

Within this context, I would like to comments on the first three questions posed in the Board's notice for this workshop.

First, what are the factors that have contributed to the decline of the fish and wildlife resources of the Bay/Delta?

The consensus of the experts is that many factors, both within the Bay/Delta and in upstream areas, have contributed to the decline of fish and wildlife resources. These factors include: flows into and out of the Bay/Delta system, deterioration of fish rearing habitats and food resources, thermal and chemical pollution, and predation and competition from stocked fishes and introduced species.

The drought conditions experienced in six of the last seven years, including the present critically dry year, have exacerbadated the effects of these factors on the aquatic resources of the Bay/Delta.

NCPA's members support the efforts of the Board to develop water quality standards that address the fish and wildlife problems of the Bay/Delta, and are willing to participate in the development of these standards. We recognize that the standards may require changes in hydropower operations. These changes, however, should be part of an integrated, balanced approach that preserves the value of CVP hydroelectric power generation to the maximum extent possible.

The Board's second question is: How have CVP operations been changed to improve fisheries in the Bay/Delta and protect endangered species?

As pointed out in the comments by Western Area Power Administration, significant changes have been made in CVP operations to enhance fish and wildlife resources and protect endangered species. These changes have been costly to the CVP and CVP power customers.

Since 1987, for example, the Bureau of Reclamation has been bypassing the power generation facilities at Shasta Dam in an effort to protect winter run Chinook Salmon, a federally endangered species. These releases are intended to provide the necessary flows and water temperatures during critical spawning and migration periods. In the last seven years, the releases have reduced hydropower generation at Shasta by 1.2 billion kilowatt-hours. While we leave it to the experts to assess the benefit of the bypass at the Shasta facilities, we know for sure that the cost impact of this mode of operation has been \$30 million.

Restrictions have also been placed on diversions from the Trinity River into the Sacramento River to meet temperature requirements, significantly reducing power generation from the Judge Carr, Spring Creek, and Keswick power plants and imposing further revenue losses on Western.

These examples indicate the impacts CVP power users have already experienced in support of measures to enhance fish and wildlife resources in the Central Valley and the Bay/Delta.

Question 3 inquires whether projects other than CVP and State Water Project have affected fisheries in the Bay/Delta.

Other projects may have contributed to problems with the fisheries, as have the factors that I mentioned earlier including pollution and outflows from thermal power plants being operated in the Bay/Delta. The Board needs to understand, assess, and address all of these factors in shaping a solution to environmental problems in the Bay/Delta.

In summary, NCPA encourages the Board to address the full range of factors that have affected the aquatic resources of the Bay/Delta Estuary. Protection of these resources requires an integrated approach that balances the needs of all users of this vital watershed, including purchasers of CVP hydroelectric generation. The Board should also provide project operators maximum flexibility in implementing the adopted water quality standards. CVP power users plan to meet with other parties in the hopes of contributing to a consensus on an integrated approach to the problems of the Bay/Delta. We hope to have something positive to report from these efforts at the Board's next workshop in July.

That concludes my prepared comments. We would be pleased to answer any questions that the Board may have at this time.