

September 29, 2015

Mr. Ben Nelson  
Bureau of Reclamation  
Bay-Delta Office  
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By U. S. Mail and E-Mail to: [BCNelson@usbr.gov](mailto:BCNelson@usbr.gov)

**Re: Comments on the Coordinated Long-Term Operation of the Central Valley Project and State Water Project Draft EIS**

The City of Sacramento (City) and the US Bureau of Reclamation (Reclamation) are party to a settlement and operating contract (Contract No. 14-06-200-6497, hereafter Settlement Contract) wherein the City gave up certain rights in exchange for Reclamation's operation of Folsom Reservoir so as to make water available to the City in accordance with the contractual schedule. The City diverts the water made available under the Settlement Contract largely at its Fairbairn facility on the Lower American River. The City also has senior water rights on both the Sacramento and American Rivers.

In practice, Reclamation and the City have a good record of cooperative communication and operations in support of their contractual relationship and the City's water rights. The Draft EIS needs to reflect Reclamation's obligation to operate in compliance with the Settlement Contract and applicable water right priorities and laws. In several respects, it does not appear to do so.

The City submits these comments in furtherance of continued operations in cooperation with Reclamation.

- The DEIS shows significant impacts to Folsom Reservoir, including decreased storage, decreased reliability, and increased incidence of "dead pool" conditions. Figure C-4-2, entitled Folsom Lake, End of September Storage (Appendix 5, Page 5A-179), suggests that Folsom Lake would reach dead pool conditions under the alternatives approximately three to five percent of the time. Allowing Folsom Lake to reach dead pool conditions is not consistent with Reclamation's obligations under the Settlement Contract.

- The DEIS appears to show CVP operations placing a disproportionate burden on Folsom Reservoir by using it as a "first responder" to meet Delta water quality standards. Folsom Reservoir is not a sufficiently large resource to sustain these demands and reliably meet local obligations including that of the City.

- The DEIS's hydrological analysis does not analyze how the CVP and SWP would be operated to provide Settlement Contract deliveries during multi-year droughts, and, as a result, does not properly analyze the impacts of the proposed action on Folsom Reservoir storage and water to be made available for diversion by the City.

- Inclusion of one climate change scenario in all of the alternatives effectively masks project-specific effects, and disables the DEIS from disclosing the project's true impacts

The City appreciates its ongoing collaborative operating relationship with Reclamation, and the opportunity to submit comments on this DEIS. Please contact Jim Peifer at (916) 808-1416 if you have any questions.

Sincerely,



William O. Busath  
Director of Utilities