

FRIANT WATER AUTHORITY

September 29, 2015

VIA ELECTRONIC MAIL

Mr. Ben Nelson, Natural Resources Specialist
Bureau of Reclamation, Bay-Delta Office
801 I Street, Suite 140
Sacramento CA 95814-2536
bcnelson@usbr.gov

Re: Draft Environmental Impact Statement Regarding Coordinated Long-term
Operation of the Central Valley Project and State Water Project

Dear Mr. Nelson,

The Friant Water Authority is a joint powers authority consisting of fourteen agencies that comprise 54% of the total Friant Division and Cross Valley Contract water supplies in the Friant Service Area. We have reviewed the draft EIS regarding the Coordinated Long-term Operation of the Central Valley Project (CVP and State Water Project (SWP) and have the following comments for your consideration.

First, we are totally confused by the characterization of the implantation of the 2008 USFWS delta smelt biological opinion and the 2009 NMFS winter run salmon biological opinion as the “No Action” alternative. While we appreciate the inclusion of the Second Basis of Comparison, which represents the true “No Action”, it is bizarre on its face to declare that the “No Action” alternative include the actions that are the subject of the environmental review. This appears to be a deliberate attempt to mislead the public as to the true impacts of the biological opinions and to mischaracterize the significant impacts on CVP contractor’s water supplies. The Final EIS should correct this “Alice in Wonderland” logic and describe the Second Basis of Comparison as the No Action alternative.

Second, we were disappointed to note that Reclamation did not even include the Friant Division facilities as part of the CVP facilities that are potentially impacted by the subject biological opinions, even though the Friant Water Authority is identified in Chapter 1, page 1-13 as an entity with which Reclamation had or was in the process of signing an MOU. Clearly, the Friant Contractors rely on the operations of the CVP and Delta exports to ensure delivery of water from the San Joaquin River.

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Third, Table 5.26. Changes in CVP Water Deliveries under the No Action Alternative as Compared to the Second Basis of Comparison, reflects no changes to deliveries to Exchange Contractors in any year. While we understand the limitations of modeling for comparison of long term operations, Reclamation is well aware that in both 2014 and 2015 there were insufficient exports of CVP water to meet the Substitute Water delivery requirements to the Exchange Contractors, which we are informed and believe to be largely the result of the implementation of the two subject biological opinions and their RPAs. As a result of these reduced exports, all of the San Joaquin River runoff in 2014 and a substantial portion of the San Joaquin River runoff in 2015 was delivered to the Exchange Contractors, which left Friant Long Term Contractors with a zero allocation in both years.

This circumstance resulted in significant impacts to farms and communities in the Friant service area, including, but not limited to the following: Water users within the Friant Division were forced to rely on groundwater alone for their entire 2014 supply. The results were predictably disastrous. Thousands of acres of productive fruit and nut trees had to be abandoned due to lack of any or sufficient water supply. The total economic loss associated with the loss of nearly 30,000 acres of trees, including lost production until crops could be replanted and begin production again, was over \$1 billion. Hundreds of domestic wells went dry. 15 communities in California ran out of drinking water supplies in 2014: 14 of those communities -- Alpaugh, Earlimart, Farmersville, Frazier Park, Huron, Lindsay, London, Madera County, Orange Cove, Pixley, Poplar, Porterville, Strathmore, Tipton, and Terra Bella -- are within the Friant Service Area. Some of these communities depend exclusively on Friant Division supplies to sustain them, while others rely on groundwater sources that are normally boosted by the surface water deliveries; last year, those sources were overtaxed and failed. Homes within these areas remain without adequate water for drinking, basic sanitation, and fire suppression. To this day, numerous families who have lost their domestic wells at their homes have to drive to a public park to shower. Some of these families have been without water in their homes for 7 – 9 months. The impact has been disproportionately large on low-income families that cannot afford to move or dig deeper wells. Impacts for 2015 have not been fully determined, but they are likely to be similar, if not greater.

This magnitude of economic damage from the implementation of the biological opinions cannot be ignored simply because the long-term CalSIM II modeling couldn't discern what was known to have happened in 2014 and 2015. The water supply analysis should be corrected to address the very real likelihood of reductions in Delta supplies to the Exchange Contractors caused by the subject biological opinions' Project modifications, which result in Friant Division water supply reductions, and the concomitant impacts of these supply reductions should be discussed in the Final EIS's resource chapters.

Mr. Ben Nelson
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If you have any questions regarding these comments, please feel free to contact me at sottemoeller@friantwater.org or (559) 306-9986.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Ottemoeller", with a long horizontal flourish extending to the right.

Stephen H. Ottemoeller
Acting Interim General Manager
Friant Water Authority