



PLACER COUNTY WATER AGENCY
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September 23, 2015

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

SUBJECT: Placer County Water Agency (PCWA) Comments

Dear Mr. Nelson:

The purpose of this letter is to present PCWA's comments to the Bureau of Reclamation (Reclamation) Draft Environmental Impact Statement for the Coordinated Long-Term Operation of the Central Valley Project and State Water Project (DEIS). Comments pertain exclusively to the Sacramento River Water Reliability Project (SRRP) as described and analyzed in Reclamation's Biological Assessment on the Continued Long-term Operations of the Central Valley Project and the State Water Project, dated August 2008 (2008 BA).

Comments to the DEIS. Considering the extent of supporting studies, analyses and authorities, and the continuing commitment by PCWA and partner agencies to complete the project, the SRRP should be incorporated into Reclamation's Final Environmental Impact Statement (FEIS) and Record of Decision (ROD). Specifically:

1. If there is no relief to the current court-ordered deadline (December 1, 2015) for issuing the ROD, then the SRRP should be included as a related project in the FEIS and ROD as described in DEIS Chapter 1, Section 1.8 and relevant parts.
2. Should the court grant an extension of the current December 1, 2015, deadline, then the SRRP should be included in Reclamation's cumulative effects analysis for the FEIR and ROD as a reasonably foreseeable future project (Reference DEIS Chapter 3, Section 3.5 and relevant parts). PCWA is prepared to provide modeling and other technical support to Reclamation in completing an updated cumulative effects analysis, as requested.

Basis for Comments:

- The Final Environmental Impact Statement (FEIS) and Planning Report for the American River Water Resources Investigation (ARWRI), completed in 1997 by Reclamation and the Sacramento Metropolitan Water Authority¹, identified an environmentally preferred alternative for future water supply needs that includes additional surface water diversions and regional conjunctive management.
- Based upon an extensive analysis, the Sacramento Water Forum Agreement, dated April 24, 2000 (WFA) defined a wide range of water management actions by regional water agencies and environmental organizations to improve water supply reliability and resource protection within the American River and adjacent watersheds. One principal objective in the WFA involves diversions on the Sacramento River to reduce future diversions from the American River.
- Public Law 106-554 dated December 21, 2000, directed the Reclamation to conduct a feasibility study of a Sacramento River diversion facility consistent with the project identified in WFA. The goal of the study was to develop a water supply plan that was consistent with the WFA objectives of pursuing a Sacramento River diversion to meet water supply needs of the Placer-Sacramento region and promoting ecosystem preservation along the lower American River.
- SRRP effects were analyzed as part of the 2008 BA. The SRRP was subsequently addressed in the National Marine Fisheries Service (NMFS) “Biological Opinion and Conference Opinion on the Long-Term Operations of the Central Valley Project and State Water Project”, dated June 4, 2009 (NMFS BiOp).
- Reclamation completed an administrative draft Environmental Impact Statement for the study. However, work was suspended in 2012 due mainly to lack of funding by the non-federal cost share partners. Pending development of an alternative funding plan and reformulated approach to the project, and considering the immediacy of the then-applicable court-ordered date for producing a ROD (December 1, 2013), PCWA accepted that Reclamation’s National Environmental Policy Act (NEPA) analysis would assume that all 35,000 acre-feet of PCWA’s CVP contract supplies are diverted from the American River Pump Station (ARPS) on the North Fork, American River.
- Since that time, and in parallel with Reclamation’s extended NEPA process, PCWA has continued to collaborate with other regional agencies to fund, develop and implement a reformulated approach to the SRRP. Project partners

¹ Now the Regional Water Authority (RWA)

include PCWA, City of Roseville (Roseville), City of Folsom (Folsom), City of Sacramento (Sacramento), Sacramento County Water Agency (SCWA), Rio Linda/Elverta Community Water District (RLECWD), Sacramento Suburban Water District (SSWD), Citrus Heights Water District (CHWD), El Dorado County Water Agency (EDCWA), San Juan Water District (SJWD) and California American Water Company (CalAm). The Sacramento Water Forum is engaged as a partner as well. The project partners are also actively pursuing Reclamation participation and assistance in the SRRP.

- Participating agencies are committed to project completion. On March 20, 2015, the partners signed a cost-sharing agreement for the Development of a Project Framework Document for a new Sacramento River Water Supply. The respective Boards of Directors for PCWA, RLECWD, SCWA, SJWD, SSWD, CHWD, EDCWA, CalAm, the City Councils of Sacramento, Roseville and Folsom have all executed this agreement in support of the project.
- The current project is consistent structurally and operationally with corresponding project descriptions in the WFA, P.L. 106-554 and the 2008 BA. The initial planning report was completed in August 2015. Detailed planning and environmental analysis is scheduled to be completed by the end of 2018. Implementation (Procurement, Design, and Construction) is tentatively scheduled to begin early 2019 and continue through 2023. The project is consistent with adaption and mitigation strategies identified in the draft Sacramento – San Joaquin Basin Plan, and is expected to be a central component of the Regional Drought Contingency Plan currently being developed by PCWA and RWA under grant from Reclamation’s WaterSMART Program.

Thank you for your consideration. Please let me know if PCWA can provide any additional clarification. I can be reached at afecko@pcwa.net or (530) 823-4490.

Sincerely

PLACER COUNTY WATER AGENCY



Andrew Fecko
Director of Resource Development

AF:vf

cc: Rich Plecker, City of Roseville
Marcus Yasutake, City of Folsom
Brett Ewart, City of Sacramento
Darrel Eck, Sacramento County Water Agency
Mary Henrici, Rio Linda/Elverta Community Water District
Rob Roscoe, Sacramento Suburban Water District
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