

From: Jeff Sutton [<mailto:jsutton@tccanal.com>]

Sent: Wednesday, September 26, 2012 6:23 PM

To: Idlof, Patricia S (Patti); Fry, Susan M

Subject: Comments from the TCCA as part of the RSE Process on the Project Description for the Central Valley Project and State Water

Patricia,

Apologies, you gave me an extension until Monday to get these comments in, but I have been sick, and unable to get these to you until today. Please accept with my apologies.

Comments from the Tehama Colusa Canal Authority (TCCA) as part of the RSE Process on the Project Description for the Central Valley Project and State Water Project.

1. Page 1, the introduction only references the upstream reservoir releases in regard to provide water for Delta export, I think it is important to note that both the CVP and SWP have contractors North of the Delta as well, and operations must be implemented in a manner to fulfill the obligations to water users within the area of origin as well.
2. Page 2, the table incorrectly references 2011 and future RBDD operations, 2011 is gates out 9 ½ months, and future operations are gates out 12 months.
3. Page 2, the table references Sacramento-San Joaquin Future 2030 Demands as “2030 Demands”, what does this mean?
4. Page 4 (end) and start of Page 5 (start), it is referenced twice that during excess water conditions, USBR is responsible to store and export as much water as possible, however when surplus is declared, some of that excess is available to North of Delta contractors as well.
5. Page 23, beginning of section on CVP Water Allocation, references greatest allocation impact on SOD, which cannot be argued with, but should acknowledge that significant, and previously rarely experienced water supply impacts have occurred to contractors within the watershed of origin as well.
6. Page 23, in reference to the CVP Water Allocation section, for purposes of a place holder, I must mention the TCCA area of litigation that alleges USBR violations of CA Water Code Section 11460.
7. Page 36-37, regarding Wilkins Slough minimum flow for navigation, I would point out that the new Red Bluff Pumping Plant and Fish Screen facility also relies on certain flows at that point in the river to allow for necessary diversions.
8. Page 40, Section on Red Bluff Fish Passage Improvement Project, it should be noted that the construct IS complete (actual substantial completion declared as of today 9/26/12), or when this document is complete will be. Also, gates operated out since 8/31/11 per old BO.
9. Page 104, Transfers section, lines 31-36, completely neglects that transfers are a necessary water supply tool in times of reduced allocation for NOD water service contractors as well.
10. General Comment: The document in many place completely minimizes, and sometimes totally neglects, operational needs and impacts suffered by CVP contractors north of the Delta. While we understand the severe impacts suffered by those south of the Delta, and that sometimes USBR puts most of its focus on exports, the documents should not neglect USBR’s responsibilities and commitments to, nor the needs of, those within the watershed of origin.

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