San Juan Water District

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May 29, 2008

Ms. Delores Brown
Chief, Office of Environmental Compliance
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Re: Comments of the American River Water Users Group on the Notice of Preparation of Environmental Impact Report and Environmental Impact Statement for the Bay Delta Conservation Plan ("BDCP EIR/EIS")

Dear Ms. Brown:

Thank you for the opportunity to provide comments in response to the March 17, 2008 notice of preparation of the BDCP EIR/EIS. The American River Water Users Group comprises Placer County Water Agency, the City of Roseville, El Dorado County Water Agency, El Dorado Irrigation District, Sacramento County Water Agency, the City of Folsom, San Juan Water District, Sacramento Suburban Water District, Carmichael Water District, Orange Vale Water Company and Citrus Heights Water District. All of our agencies receive water supplies from the American River and are responsible for providing water service to hundreds of thousands of customers.

The BDCP accurately recognizes the dual problems of water supply reliability and environmental health faced by the Delta today. Proposals to solve these problems have included the construction of new conveyance facilities and the implementation of improved habitat management and conservation measures with the goal to improve both water supply reliability and the environmental health of the Delta. Our group recognizes that, to implement these proposals, changes in the operations of the State Water Project and Central Valley Project may be considered in the BDCP. Such changes, however, have the potential to result in adverse impacts to water supplies or to the environment outside the BDCP study area. We ask that you develop a range of alternatives that will avoid any of these redirected impacts, and that all potential impacts within these areas of concern be fully identified and mitigated in each alternative. The BDCP EIR/EIS should not, however, analyze alternatives that would involve involuntary reallocations of water supplies from upstream uses to Delta uses, for example, through regulatory actions.

Actions to address the ecosystem and water supply reliability crisis in the Bay Delta must include adequate assurances that Delta solutions:

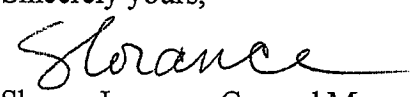
- are based on sound science

- are part of a comprehensive water management approach that includes both conveyance and water supply
- are protective of watershed of origin rights
- are based on beneficiary pays principles
- avoid redirected impacts and costs to upstream areas, including reduction in reliability of water supplies or water quality and increased stream temperatures in upstream tributaries
- include water quality standards for the Bay Delta that take into account the potential for failure of Delta levees and that do not require significant unscheduled water releases from Folsom Reservoir

Due to its proximity to the Delta, unscheduled water releases from Folsom Reservoir have often been made to provide water supplies to address changing conditions in the Delta. Such releases have caused adverse impacts to the quantity and quality of water available for lower American River flows and deliveries from Folsom Reservoir within this region, as well as adverse impacts to implementation of the January 2000 Water Forum Agreement's proposed Flow Management Standard for the lower American River below Nimbus Reservoir. Actions to implement the BDCP must avoid these types of impacts. The BDCP EIR/EIS should analyze all impacts to upstream water supplies (including storage under upstream water rights and the frequency with which the State Water Resources Control Board's Term 91 is triggered), water quality and lower American River flows (including water released from Folsom Reservoir). The evaluation of impacts on Folsom Reservoir water availability and quality is especially critical because this reservoir is the only source of CVP water physically available to CVP contractors in the American River Division.

Thank you for the opportunity to provide these comments. Please add the following to the contact list for this process on behalf of the American River Water Users Group: Ms. Shauna Lorance, General Manager, San Juan Water District, P.O. Box 2157, Granite Bay, CA 95746-2157 (slorance@sjwd.org).

Sincerely yours,



Shauna Lorance, General Manager,
San Juan Water District, for the American River Water User Group

cc: Placer County Water Agency
City of Roseville
El Dorado County Water Agency
El Dorado Irrigation District
Sacramento County Water Agency
City of Folsom
Sacramento Suburban Water District
Carmichael Water District
Citrus Heights Water District
Orange Vale Water Company