



ECOS
ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO



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Board of Directors,
Sacramento Municipal Utility District
6301 S Street
Sacramento, CA 95817

RE: Proposed Contract between SMUD and Roseville City to Transfer up to 18,000 Acre Feet of Water to the City of Roseville

Dear Members of the Board

Recently the Environmental Council of Sacramento and Habitat 2020 became aware of the pending temporary water transfer between the City of Roseville and SMUD. Our review of the environmental assessment and decision document prepared by the Bureau of Reclamation found specific deficiencies in the analysis and a casual dismissal of the transfer's cumulative significance. We believe that the proposed transfer of water does not contain the necessary safeguards to protect Lower American River fisheries. We request that the SMUD Board direct its staff to include provisions in the contract that will address these concerns.

Years ago the Sacramento Region identified the importance of managing its water resources for all beneficial users and created by agreement the Water Forum. Over the years, the Water Forum process has employed a proven model of stakeholder-driven "bottom up" decision making. This had led to the development of a Modified Flow Management Standard for the American River which provides flow standards and water temperatures for the lower portion of the American River, minimum storage levels for Folsom Reservoir, and other significant water management measures including the important role conjunctive use of water can play in the region's water supply planning. ECOS/Habitat 2020 is a signatory to the Agreement as is the Sacramento Municipal Utility District (SMUD) and the City of Roseville.

We understand that the Bureau of Reclamation plans to control the timing and amount of water transferred based upon requirements of the 2009 US Fish and Wildlife Service Formal Endangered Species Act Consultation on the Proposed Coordinated Operations of the Central Valley Project and State Water Project, the 2009 National Marine Fisheries Service Biological Opinion and Conference Opinion on the Long term Operations of the Central Valley Project and State Water Project, and the 2016

Coordinated Long Term Operations of the Central Valley Project and State Water Project Record of Decision. The Bureau's environmental assessment of the proposed transfer seems to imply that transfers can occur regardless of the rainfall conditions experienced.

We believe the transfers must be governed by the standards and requirements contained in the Modified Flow Management Standard. These standards and requirements would much better ensure that the transfer would not negatively impact the American River flow and temperature standards.

We strongly urge SMUD and the City of Roseville to formally agree to manage the timing and amount of water transferred consistent with the Modified Flow Management Standard. Further, we urge that the SMUD-Roseville agreement provide for the development of year-specific criteria applicable to the annual transfers, with input and review by the Water Forum and its Environmental Caucus. In this way, the most environmentally protective transfer actions will be taken in accordance with the agreements all parties are bound to uphold.

Therefore, we respectfully request that the SMUD Board direct staff to work with the Water Forum and the City of Roseville to establish an appropriate framework for managing the water transfers consistent with the Modified Flow Management Standards prior to finalizing the proposed Water Transfer Agreement with Roseville. We further request that the revised Agreement be subject to public review by both agencies prior to finalization.

SMUD has a long history of pursuing its mission in an environmentally responsible manor. We believe this temporary transfer can be managed in that fashion and urge your Board to uphold that tradition.

Signed



Ralph Propper
President, ECOS



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Co-Chair, Habitat 2020

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