



**Environmental Utilities
Administration**
2005 Hilltop Circle
Roseville, California 95747

February 2, 2012

Mr. Phil Isenberg
Chair, Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, California 95814

VIA ELECTRONIC MAIL:
eircomments@deltacouncil.ca.gov

Re: City of Roseville's Comments on Draft Delta Plan EIR

Dear Mr. Isenberg:

The City of Roseville provides water and electric service to its approximately 120,000 citizens. To provide water, Roseville contracts for deliveries from Folsom Reservoir. In permitting the reservoir's water rights in 1958, the State Water Rights Board recognized that Roseville, like other nearby communities, is "naturally dependent" on that water source and applied specific terms to those water rights to protect Roseville's ability to obtain water from the reservoir. (Decision 893, pp. 54, 72.) To help balance our region's coequal objectives of providing water supplies for the region to meet its 2030 demands and protecting the lower American River – a rare urban river designated under the federal Wild & Scenic Rivers Act – Roseville participated in developing the historic Water Forum Agreement. Since signing that Agreement in 2000, Roseville has sought to conjunctively use its surface-water supplies and local groundwater by pursuing the Central Valley's first aquifer storage and recovery (ASR) project. Accordingly, Roseville has been instrumental in developing a statewide water quality general permit for ASR programs, which permit has reached the administrative draft stage. Like Roseville's water service, its electric service relies on water resources, specifically hydroelectric generation. To protect all of these resources, Roseville is a member of the Regional Water Authority (RWA).

Roseville is very concerned about the Council's proposal, stated in the draft Delta Plan and the related draft environmental impact report (DEIR), that the implementation of an undefined "more natural flow regime" be accelerated. Implementation of such a flow regime would not only reduce crucial storage in Folsom Reservoir, but also would shift significant amounts of hydroelectric generation from the high-demand summer months to the low-demand spring months. Roseville believes that this proposal, if implemented, could dramatically reduce the surface-water supplies on which it has historically depended and on which its groundbreaking water management strategies now depend. Roseville therefore joins in RWA's comments on the Council's DEIR for the Delta Plan.

Very truly yours,

Derrick Whitehead
Environmental Utilities Director