LO202 City of Redding

CITY OF REDDING

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P.O. Box 496071, Redding, CA 96049-6071

February 2, 2012

RE: Environmental Impact Report Comments

Delta Stewardship Council:

The City of Redding appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Delta Plan prepared by the Delta Stewardship Council (DSC). The City provides both domestic water and electricity to its residents through its municipally-owned utilities. So as to avoid duplicative comments, the City hereby incorporates, by reference, the comments submitted by Shasta County in its letter dated January 30, 2012. LO202-1

The City believes the DEIR fails to thoroughly analyze the impacts that the identified alternatives would have on the citizens of Shasta County and the City of Redding. The City urges the DSC to reject the DEIR in its current form and direct all impacts be reassessed and the proposed flow changes contemplated by the State Water Resources Control Board (SWRCB) be adequately modeled.

In addition to the water supply and recreation impacts identified in the Shasta County letter, hydroelectric generation would severely impact the City of Redding. Redding Electric Utility (REU) is a publicly-owned electric utility that has been serving the electricity needs for the City of Redding since 1921. REU receives nearly 8 percent of its electricity output from the Federal dams in Northern California that make up the Central Valley Project (CVP). At roughly 30 percent of Redding's resource portfolio, federal hydropower from the CVP system remains one of the most cost-effective, renewable, and carbon-free resources in Redding's power portfolio. Thus, REU has a keen interest in any proposal that aims to alter the flows of the CVP.

REU believes the DSC, in order to more comprehensively address Bay-Delta ecosystem issues and assure its actions meet California's coequal water supply and Bay-Delta ecosystem goals, should direct the SWRCB to wait and see what the Bay-Delta Conservation Plan's (BDCP's) comprehensive process develops before the SWRCB considers its own actions. LO202-2

The SWRCB's 2010 Delta Flow Criteria uses a percentage of the unimpaired flow as a proposed method of achieving a more natural hydrograph. While the use of some percentage of unimpaired flows may be helpful in an initial evaluation of the flow needs in an unaltered system, REU believes this over-simplification in a watershed so highly modified as the Bay-Delta Watershed is

Response to comment LO202-1

Comment noted.

Response to comment LO202-2

Please refer to Master Response 5.

unrealistic. The Bay Delta Watershed is no longer a natural system as every river system that feeds it has been modified through various state and Federal laws in an attempt to assist with flood control, water storage, renewable power, recreational needs, and habitat restoration.

Spawning habitat is limited to areas below the major flood control dams so that temperatures below these dams are critical to the natural spawning success of Salmon and Steelhead. For example, a temperature control device was installed at Shasta Dam (at a cost of $60 million) due to the need to release colder water in the summer months down the Sacramento River. This device only functions adequately due to the cold water pool behind Shasta Dam in the Shasta Reservoir. This is only made possible by storing water in wetter periods, thus adjusting the natural hydrograph.

Summertime flows are much higher now than under natural conditions in order to meet mandatory temperature targets. Reverting back to low historic summer flows would be impractical and potentially a violation of Federal laws. The DEIR must assess these realities.

The DEIR fails to disclose any of the impacts that are likely should the SWRCB implement new flow objectives as directed by the Delta Stewardship Council. The water and energy interests of Northern California have commissioned a study on the impacts of the SWRCB's 2010 Delta Flow criteria focusing on the provisions related to recreating a more natural hydrograph. Over the past several months, the parties[1] have collectively performed analyses of a portion of the impacts to other beneficial uses and public trust resources if the 2010 Delta Flow Criteria or some lesser version of the same paradigm, were implemented. The impact studies use the State Water Project (SWP) and CVP system as surrogates for the types of impacts that would be seen by Sacramento Valley users; a separate analysis was conducted for the San Joaquin River system. LO202-2

In short, our analyses conclude that:

- The impacts of the 2010 Delta Flow Criteria would be devastating to other beneficial uses of water, including hydroelectric generation.
- Reservoir levels in all of the major SWP and CVP reservoirs (Oroville, Trinity, Shasta, and Folsom) would be greatly reduced and the new flow criteria would result in "dead pool" levels commonly.
- Clean hydropower generation would be reduced on average by 30 percent.
- Summertime hydropower production would be reduced by 50 to 70 percent, destabilizing California's energy grid.

[1] Current coalition members include Redding Electric Utility, City of Redding, Department of Public Works, Association of California Water Agencies, California Municipal Utilities Association, Northern California Water Association, Yuba County Water Agency, Northern California Power Agency, State Water Contractors, Sacramento Municipal Utility District, and Westlands Water District.

No comments

- n/a -

- Although the 2010 Delta Flow Criteria could result in higher spring flows and hydropower production, the added production during these typically energy-surplus times would not offset the reductions in power production in the summer-high demand periods.

- Loss of hydropower production, which has a unique balancing value in the energy grid, would be offset by other sources that are likely carbon producing, thus frustrating the state's efforts to lower its carbon footprint as set forth in Assembly Bill 32. LO202-2

- Loss of hydropower's "ancillary services" would set back the integration of renewable energy resources and force increased reliance on conventional gas-fired plants, reducing the state's ability to achieve its 33 percent by 2020 renewable resource goals per Senate Bill x1-2.

The City of Redding understands that the Delta Plan DEIR, once finalized, will become state law. Thus, it is of the utmost importance that all additional impacts be fully analyzed within the DEIR to understand the consequences such a policy would have on all of the citizens in California, including those that rely on the cost-effective, renewable, and carbon-free energy hydroelectric generation from the CVP.

Sincerely,

Barry Tippin
Electric Utility Director

Brian Crane
Public Works Director

REU
Redding Electric Utility

PUBLIC WORKS
CITY OF REDDING
CALIFORNIA
DEPARTMENT

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No comments

- n/a -