MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

November 26, 2001

Mr. Len Marino
Department of Water Resources
State Water Project Analysis Office
1416 Ninth Street
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Marino:

Comments on September 27, 2001 Draft NEPA Scoping Document 1 and CEQA Notice of Preparation for Oroville Facilities Relicensing (FERC Project No. 2100)

The Metropolitan Water District of Southern California ("Metropolitan") is pleased to submit the following comments on the September 27, 2001 Draft National Environmental Policy Act ("NEPA") Scoping Document 1 and California Environmental Quality Act ("CEQA") Notice of Preparation for the Federal Energy Regulatory Commission's ("FERC") Relicensing of the Oroville Facilities, FERC Project No. 2100 (hereinafter referred to as "Scoping Document").

Metropolitan is a member agency of the State Water Contractors (SWC), and we support the comments submitted by the SWC. A copy of written comments submitted by Metropolitan at the public hearing on October 30, 2001 is also attached for inclusion in the administrative record.

The Oroville Facilities' importance to the State of California's water supply and power generation cannot be overstated. It is critical that the California Department of Water Resources act as a good steward and safeguard those benefits through the relicensing process. At the same time, preservation of the flood control, recreation and fish and wildlife objectives provided by the Oroville Facilities is also important. The relicensing process should balance decision-making regarding the above resources and objectives without compromising any of their associated existing benefits.

We thank you for this opportunity to comment on the Scoping Document, and we look forward to participating further in the Oroville relicensing proceedings.

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Very truly yours,

(for) Laura J. Simonek
Manager, Environmental Planning Unit

Enclosure

cc: Mr. James Fargo
Federal Energy Regulatory Commission
Office of Hydropower Licensing
888 First Street, N.E.
Washington, DC 20426

STATEMENT OF TIMOTHY QUINN
VICE PRESIDENT, STATE WATER PROJECT RESOURCES
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

October 30, 2001

Good afternoon, I am Timothy Quinn. I serve as the Vice President for State Water Project Resources of the Metropolitan Water District of Southern California (Metropolitan). Today, I would like to offer comments on two aspects of this proceeding: first, regarding Oroville Reservoir as a power generation facility; second, and more importantly, regarding the relationship between this proceeding and the CALFED process, a statewide planning effort regarding the entire Bay-Delta watershed, of which Oroville Reservoir is only a small part.

POWER GENERATION

With regard to Oroville as a power generation facility, it is important to note that Oroville Reservoir provides clean, renewable hydroelectric power, which is furnished to the statewide power grid. While the total power demands of the State Water Project (SWP) are tremendous and exceed the power generation capabilities of Oroville, the SWP is primarily operated to produce energy for the grid during on-peak hours and to consume energy during off-peak hours. This method of operation has provided enormous benefits to California energy consumers during the recent energy crisis by keeping peak energy consumption down and the lights in homes, factories, and businesses on.

THE CALFED PROCESS

More important, it is critical that FERC relicensing respect the CALFED Bay-Delta Program, which for nearly seven years has been developing a comprehensive program – now in implementation – for managing the entire Bay-Delta watershed for environmental and economic purposes.

CALFED has developed a far-reaching plan for environmental protection and restoration in the Bay-Delta watershed. This plan includes an Environmental Water Account and

other measures to provide water flows for fish populations based on sound science. The plan incorporates substantial operational restrictions on the SWP and federal Central Valley Project for the same purpose. In addition, the CALFED Program is now implementing a multi-billion dollar program to restore habitat throughout the watershed. We strongly believe that it would be highly inappropriate for this process to second-guess the measures and level of protection for the environment developed through this extensive public process.

With regard to water supply issues, the CALFED process has strongly emphasized development of local resources and other innovative management approaches to meet growing demands for water in California. Nowhere has this mandate been more fully implemented than in Southern California. The Southern California Regional Integrated Resources Plan provides for billions of dollars of investment in reclamation, conservation, water transfers, and other measures to reduce the demands for SWP water. We have also invested billions of dollars in south-of-Delta storage, including Diamond Valley Lake in Riverside County and major groundwater storage projects, to take advantage of high-flow periods and reduce demands on the SWP system when it is critically dry.

The plain fact is that in Southern California, we are not relying on supplies from Oroville Reservoir to meet growing demands for water. While the reliability of existing SWP supplies is critical for the regional economy, additional supplies from Oroville are not part of our plans to meet Southern California's future water supply needs. We respectfully request that this fundamental fact be recognized as this process moves forward. Thank you very much for this opportunity to express the views of Metropolitan regarding this important proceeding.