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WATER SUPPLY IMPROVEMENTS

OFFICE OF THE
CITY ATTORNEY

SAMUEL L. JACKSON
CITY ATTORNEY

WILLIAM P. CARNAZZO
ASSISTANT CITY ATTORNEY

CITY OF SACRAMENTO
CALIFORNIA

980 NINTH STREET
TENTH FLOOR
SACRAMENTO, CA
95814-2736

PH 916-264-5346
FAX 916-264-7455

DEPUTY CITY ATTORNEYS
RICHARD E. ARCHIBALD
DIANE B. BALTER
DENNIS M. BEATY
CHRISTOPHER L. BROOKS
BRUCE C. CLINE
SHANA S. FABER
H. MICHON JOHNSON
GUSTAVO L. MARTINEZ
JOHN A. NAGEL
JOE ROBINSON
ROBERT K. SANDMAN
STEPHANIE K. SHIMAZU
SANDRA G. TALBOTT
ROBERT D. TOKUNAGA

June 16, 1997

SENT BY FAX AND U.S. MAIL

Kurt Ladensack
East Bay Municipal Utility District
P.O. Box 24055, MS 305
Oakland, CA 94623-1055

Re: **Revised NOP For EBMUD Supplemental Water Supply Project Joint EIR/EIS**

Dear Mr. Ladensack:

These comments on the above revised NOP are submitted on behalf of the City of Sacramento Department of Utilities. As the City would be unable to support any diversion of American River water for export at Nimbus Dam, the City welcomes the addition of the joint project alternative to EBMUD's Supplemental Water Supply Project Joint EIR/EIS.

The NOP states that the EIR/EIS will analyze the joint project alternative at an equal level of detail as the Nimbus diversion alternative previously described in the Folsom South Canal Connection Project NOP. To do this, the analysis performed for both alternatives:

- Should include a complete analysis of both alternatives' potential impacts on the instream resources of the lower American River, alone and in conjunction with the future cumulative effects of all other foreseeable demands for American River water.

- Should include an analysis of both alternatives' potential impacts on the future water supply needs of the Sacramento region, including an analysis of the potential impacts on the water supply and water rights of purveyors in the Sacramento region.

- Should explain in detail the relationship of both alternatives to the other elements of EBMUD's Water Supply Master Plan.

In order to provide an adequate and realistic analysis of both alternatives' impacts on the various uses and users of lower American River water, the draft EIR's analysis of future water availability under EBMUD's Bureau of Reclamation contract should not be limited to the historic record of water availability, but should consider all reasonably foreseeable future operating criteria for Folsom Reservoir, including the operation of Folsom Reservoir to meet the requirements of the Central Valley Project Improvement Act and/or the proposed flow pattern being developed in the Water Forum process. Any differences between the potential environmental and/or water supply impacts of the two alternatives should be clearly identified.

The City appreciates the opportunity to submit these comments.

Very truly yours,

SAMUEL L. JACKSON,
City Attorney

JOE ROBINSON
Deputy City Attorney

cc: Jim Sequeira

EBMUD.2