

**Congress of the United States**  
**Washington, DC 20515**

February 12, 2019

Mr. Ernest Conant  
Regional Director, Mid-Pacific Region  
United States Bureau of Reclamation  
2800 Cottage Way, Room E 1604  
Sacramento, California 95825

RE: Initial Allocation for South-of-Delta Water Contractors

Dear Mr. Conant:

As you know, one of the most significant challenges faced by communities and farmers served by south-of-Delta water contractors is the uncertainty concerning the timing and the quantity of the water allocations that will be made available by the Central Valley Project (CVP). In prior years, the Bureau of Reclamation has announced a low initial allocation in February and has increased the allocation as the contract year has progressed. We request that Reclamation take into account the additional water supply benefits of recent modifications to project operations and the precipitation and snowpack California has experienced since February 1st when determining initial water allocations.

To illustrate the challenges with past initial allocation practices, in the 2010 contract year, Reclamation announced in February that south-of-Delta CVP agricultural water service contractors would receive a 5 percent initial allocation, which was then increased in March, April, and June to 25%, 30%, and 45%, respectively. This uncertainty makes it nearly impossible for farmers or communities to efficiently plan their operations and increases the likelihood of pumping from severely overdrafted groundwater basins during the late winter and spring.

In 2016, with the passage of the Water Infrastructure Improvements for the Nation (WIIN) Act, Congress tried to address this problem. The WIIN Act increased the flexibility for operations of the CVP and State Water Project and directed the Secretary of the Interior to operate the CVP to provide contractors with the “maximum quantity of water supplies practicable . . . as quickly as possible, based on available information.” 130 Stat. 1852.

We understand that there are many factors that affect Reclamation’s initial allocation for south-of-Delta CVP water contractors, including current water storage levels in CVP reservoirs, current hydrologic conditions, and forecasted operations under federal and state regulatory requirements. The February 1, 2019, snow survey indicated that the snow pack for the northern and central Sierra Nevada Mountains was at or above 100% of the long-term average for the date, and close to 80% of the April peak, and during the last week California has been blessed with significant snow fall and precipitation. Indeed, there are press reports that some areas in the northern and central Sierra Nevada Mountains received more than 10 feet of snow over a three-

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day period at higher elevations. On February 3, 2019, storage in all CVP reservoirs was near or more than 100% of the long-term average for the date.

In prior years under similar hydrologic circumstances, we have been made aware that Reclamation may have provided south-of-Delta agricultural water service contractors with an initial allocation of 25 percent. However, pursuant to the direction under the WIIN Act that the maximum quantity of water practicable be made available "as quickly as possible," it appears these hydrologic conditions, along with the operational flexibility provided by recent amendments to project operations, would support a higher initial allocation for south-of-Delta CVP agricultural water service contractors. In fact, we have been provided an analysis by San Luis & Delta-Mendota Water Authority that indicates an initial allocation for south-of-delta agricultural water service of 40% would be supported. We believe that it would be prudent for Reclamation to incorporate the benefits of recent snowfall and precipitation into its analysis to determine initial allocations to its contractors, instead of relying exclusively on the February 1 projection, which is no longer a realistic picture of available water supply. We urge Reclamation to allocate to south-of-Delta water contractors the maximum quantity of water practicable, given current water supply conditions and projections, and to revise the allocation as conditions change through the remainder of the winter and spring.

Please contact us at your earliest convenience if you would like to discuss this matter.

Sincerely,



JIM COSTA  
Member of Congress



DIANNE FEINSTEIN  
U.S. Senator



TJ COX  
Member of Congress