



Fresno Metropolitan Flood Control District

Capturing Stormwater Since 1956

File 140.23

140.224

630.81

February 21, 2020

The Honorable Jared Huffman
Representative, 2nd Congressional District
1527 Longworth HOB
Washington, DC 20515

Dear Congressman Huffman,

Support for the FUTURE Drought Resiliency Act

On behalf of the Fresno Metropolitan Flood Control District (District), I am writing to express our support for the FUTURE Drought Resiliency Act (Act). As a Congressional Member representing the great State of California, you know all too well the issues the State has with water and the need for additional storage of this precious resource.

Elements of the Act intersect with the challenges faced by our agency to capture, store and beneficially use surface and groundwater. We strongly support the provisions in the Act to provide funding for Water Control Manual Updates in forecast informed water operations (FIRO) projects and additional storage (Title II, Section 210). We also encourage the funding of non-Federal projects that could serve to convey surface water to groundwater storage facilities (Title I, Sections 103(a)(6)(A), 103(b) and 103(f)). The District is currently exploring just such a project: a turnout from the Friant-Kern Canal (a joint U.S. Bureau of Reclamation/Friant Water Authority facility) into our largest reservoir, for routing into groundwater recharge facilities. Each of these elements of the Act recognizes areas where local agencies need assistance.

We are a California Special District located in the north-central portion of Fresno County, between the San Joaquin River and the Kings River. We are authorized to control stormwater within an urban and rural foothill watershed of approximately 400 square miles. The District service area is home to approximately 650,000 people, which includes the Fresno-Clovis metropolitan area, and unincorporated lands to the east and northeast.

Our primary purpose is to plan, build and expand systems to safeguard the public from infrequent weather events. We operate and maintain, through a U.S. Army Corps of Engineers (Corps) Local Cooperation Agreement, Corps-built facilities east of the Fresno-Clovis metropolitan area. Known as the *Redbank and Fancher Creeks Flood Control Project* (Project) this system consists of five dams and related works for the capture and control of surface waters. Through extensive interconnections between the Project and our system of stormwater ponding basins, natural channels and irrigation canals, we can conduct recharge throughout most of our service area, which is in a critically-overdrafted groundwater basin. We look to the re-operation of our reservoirs and the adoption of FIRO to optimize our capture of stormwater. However, the Corps Water Control

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Manual governing our handling of stormwater (which has its origins in a 1954 operations manual) mandates that we release accumulating stormwater from our system as soon after a storm event as possible. This project is in dire need of updates to the Water Control Manual to provide beneficial use of captured stormwater.

Accordingly, we offer, for consideration, the following comments regarding your proposed FUTURE Drought Resiliency Act:

Water Control Manuals

The Corps' Water Control Manual amendment process needs to be simplified. There is a widely-acknowledged need to update many Corps manuals in response to the rapidly growing body of weather and climate data available to watershed managers, and the capability to model and predict watershed-response to precipitation events. The development of resiliency in the management of our federally-built water management infrastructure will require that federal water agencies replace older formulaic and fixed approaches with an experimental, iterative, forward-looking mindset. This transformation will need, of course, to be risk-informed, but not entirely risk-averse, given that the countervailing risk of business-as-usual makes us vulnerable to the problems attendant to failure to capture and store water critical to the long-term well-being of our citizens and the economy.

Forecast Informed Reservoir Operations

For federal, state and local agencies to make the leap from Water Control Manual-based management of dams to Forecast Informed Reservoir Operations, candidate watersheds need modern, robust and appropriately dense networks of weather and streamflow data collection. Data collection and reporting methods need to be standardized to integrate with those of NOAA, DWR and other FIRO research partners. This can be expedited by the expansion of federal funding to establish, repair and rehabilitate stream gaging on waterways leading into and out of Corps-built reservoirs, and for the establishment of research-grade weather stations in the associated watersheds.

Army Corps Deviation Requests

The Corps' Deviation Request process has the potential to allow reasonable experimentation with FIRO-like methods at a Corps-built facility, by allowing the operation of a reservoir outside the normal parameters established by its Water Control Manual. However, Deviation Requests can be nearly as time-consuming, expensive and complex as a formal Water Control Manual Update. A revised or new process should be provided that is nimble enough to respond within a few months of the prediction or arrival of drought conditions.


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Army Corps Conveyance of Facilities to Local Sponsors

Conveyance of Corps facilities could be simplified. The requirement *that there be no further federal interest in the project* for it to be conveyed to a local sponsor is an unproductively high bar. Conveyance should be based on the receiving agency's ability to manage a project for project purposes, and a willingness and capacity to assume liability for its management of the project.

Should you need further information or if I can be of any assistance in this effort, please contact me or my Senior Administrative Analyst, Andrew Remus, at (559) 456-3292 or alanh@fresnofloodcontrol.org. I thank you in advance for your efforts with this request.

Very truly yours,



Alan Hofmann
General Manager- Secretary

AH/rl

- c: Susan Gilson, Executive Director, National Association of Flood & Stormwater Management Agencies (NAFSMA)
Dave Eggerton, Executive Director, Association of California Water Agencies (ACWA)
David Reynolds, Washington DC Office, Association of California Water Agencies
Logan Ferree, Deputy Chief of Staff, 2nd Congressional District