



July 25, 2014

Officers

**Harvey A. Bailey**, *President*  
**Joan Maher**, *1<sup>st</sup> Vice President*  
**Vacant**, *2<sup>nd</sup> Vice President*  
**Sandy Willard Denn**, *3<sup>rd</sup> Vice President*  
**Vacant**, *Treasurer*  
**Lawrence Bauman**, *Executive Director*

Ms. Brooke Miller-Levy, Project Manager  
Central Valley Project Cost Allocation Study  
Bureau of Reclamation, MP-730  
2800 Cottage Way  
Sacramento, CA 95825

Board of Directors

Subject: Central Valley Project (CVP) Water Association (CVPWA) Comments on Reclamation's CVP Cost Allocation Study (CAS) Waiver Regarding the Following: (1) Period of Analysis and (2) When to Apply New CAS Percentages to CVP Construction Costs

*Northern Zone*

**Mike Alves**  
*Kanawha & Glide Water District*  
**Lance Boyd**  
*Princeton-Codora-Glenn ID*  
**David Coxey**  
*Bella Vista Water District*  
**Sandy Denn**  
*Tehama-Cohusa Canal Authority*

Dear Ms. Miller-Levy:

CVPWA offers the following comments regarding Reclamation's Mid-Pacific Region's (Region) proposed subject waiver as discussed at July 8, 2014 meeting:

*Central Zone*

**Alexander R. Coate**  
*East Bay Municipal Utility District*  
**Jerry Brown**  
*Contra Costa Water District*  
**Ted Costa**  
*San Juan Water District*  
**Joan Maher**  
*Santa Clara Valley Water District*

1. CVPWA concurs with the Region's decision to use 100 years beyond the completion of the final CVP cost allocation as the period of analysis for the current CVP CAS.
2. CVPWA does not have enough information currently to make an accurate and informed comment on preference regarding the starting date for applying final CVP cost allocation factors for CVP repayment purposes. When that information becomes available, CVPWA would like to have the opportunity to comment again on this matter.

*Western Zone*

**Dennis Falaschi**  
*Panoche Water District*  
**Anthea Hansen**  
*Del Puerto Water District*  
**Martin McIntyre**  
*San Luis Water District*  
**Frances Mizuno**  
*San Luis & Delta-Mendota WA*

However, if we had to make a decision, our preference would be 2017, even though I indicated at the meeting that 2017 could be taken off the table and not be a consideration. Our rationale for this decision is as follows: (a) it is consistent with past CVP cost allocation updates and applications to apply the new factors prospectively; and (b) it complies with Reclamation Manual Directives and Standards PEC 01-02 on Project Cost Allocations.

*Southern Zone*

**Harvey A. Bailey**  
*Orange Cove Irrigation District*  
**David Nixon**  
*Arvin-Edison Water Storage District*  
**Ronald D. Jacobsma**  
*Friant Water Authority*  
**Eric Limas**  
*Lower Tule River Irrigation District*

CVPWA looks forward to its continued participating with Reclamation throughout this important process. If you have any questions regarding these comments, please contact me at 916-448-1638 or [lbauman@cvpwater.org](mailto:lbauman@cvpwater.org).

Sincerely,

Lawrence J. Bauman, Executive Director  
Central Valley Project Water Association

1521 "I" Street  
Sacramento, CA 95814  
Tele: 916-448-1638  
Fax: 916-446-1063  
Email:

Larry: [lbauman@cvpwater.org](mailto:lbauman@cvpwater.org)

cc: via e-mail only

Mr. Jason Phillips  
Deputy Regional Director  
Bureau of Reclamation, MP-115  
2800 Cottage Way  
Sacramento, CA 95825

Ms. Brenda Bryant  
Assistant Regional Director for Business Services  
Bureau of Reclamation, MP-110  
2800 Cottage Way  
Sacramento, CA 95825

Ms. Michelle Denning  
Regional Planning Officer  
Bureau of Reclamation, MP-700  
2800 Cottage Way  
Sacramento, CA 95825