

RECLAMATION

Managing Water in the West

Allocation of Mitigation Costs

June 17, 2015



U.S. Department of the Interior
Bureau of Reclamation

Mitigation

- Mitigation is broadly defined as project-related activities to avoid, minimize or compensate for the adverse effects of project construction and operations on affected resources (i.e., environmental, archeological or cultural).

Mitigation (Cont.)

- Examples
 - Meeting SWRCB D-1485
 - CVPIA water releases
 - Required actions in excess of current SWRCB requirements (Biological Opinion RPA actions)
 - Other site-specific mitigation

Current Practice

- Allocate costs
 - Legislative Directive
 - Authorized Reimbursable Purposes

Reclamation Policy (PEC P07 & LND 01-01)

- Mitigation is to be considered
 - Necessary for delivering water
 - Cost of doing business
- Distributed among all project purposes

Reclamation Policy

- Clarifications/Exceptions
 - SOD – where 15 percent is reimbursable and remainder non-reimbursable
 - CVPIA – Congress clearly specified a portion as non-reimbursable, otherwise will be allocated among reimbursable purposes

Recommendation

- Continue to follow legislative directive where provided
 - CVPIA
 - Other site-specific mitigation
- Adhere to Reclamation Policy
 - Meeting D-1485
 - Exceeding current SWRCB requirements (Biological Opinion RPA actions)

Transition

- In 1970 (1975) only had some “other mitigation” in existence with clear legislative directive
- CVPIA has clear legislative directive
 - Have to suballocate reimbursable portion
- Water released for meeting D-1485 and exceeding current SWRCB requirements (Biological Opinion RPA actions) will not have specific and will have joint costs

Implementation

- Storage and Reservoir Costs
 - Water supply (IRR, M&I, Refuge)
 - WQ (SWRCB standards exceeding D-1485)
 - Joint Costs (remaining)

Joint Costs

- Allocated in proportion with remaining benefits

Questions?

RECLAMATION