

VIA EMAIL

bmillerlevy@usbr.gov

May 2, 2014

Ms. Brooke Miller-Levy
Mid Pacific Regional Office
Federal Office Building
2800 Cottage Way
Sacramento CA 95825-1898

Re: Comments on CVP Cost Allocation Study Draft Findings and Recommendations Table

Dear Ms. Miller-Levy:

The following comments are submitted on behalf of Stockton East Water District on the CVP Cost Allocation Study Draft Findings and Recommendations.

Water Supply Deliveries

The table indicates that “Future water deliveries will be estimated by the CalSim2 model . . . Reclamation will have to determine how future water deliveries will be made for the New Melones Project independently, as there is no current plan of operations.

Water Quality: Benefits Methodology

The table states:

The CVP maintains increased flows in the Trinity, American, and Stanislaus rivers to improve the fisheries habitat and water quality conditions. Flow conditions in the lower reaches of the Trinity, American, and Stanislaus rivers are maintained under flow requirements set by the California State Water Resources Control Board (SWRCB). These costs are generally

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embedded in the costs of operating and maintaining the CVP, and for the most part, reimbursed by the authorized water and power beneficiaries. The costs of providing increased flows in the Stanislaus River however, are deemed non-reimbursable and assigned to the water quality purpose for the New Melones Unit.

When referencing increased flows to improve fisheries habitat flows in the Stanislaus are not maintained solely under flow requirements set by the State Water Resources Control Board. For many times of the year the flow requirements are governed not by State Board decisions, but by Biological Opinions established for the project.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jeanne Zolezzi". The signature is written in a cursive, flowing style.

JEANNE M. ZOLEZZI
Attorney-at-Law

cc: Mr. Scot Moody