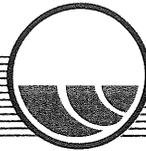


Chron



Westlands Water District

3130 N. Fresno Street, P.O. Box 6056, Fresno, California 93703-6056, (559) 224-1523, FAX (559) 241-6277

September 26, 2014

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

Subject: CVP Cost Allocation Study (CAS) Draft Findings and Recommendations
Table Comments to Issue Paper: Municipal and Industrial Benefit
Methodology

Dear Ms. Miller-Levy:

Attached are Westlands Water District (District) comments associated with the CAS Draft Findings and Recommendations Table updated August 26, 2014 to include issue paper entitled *CVP Cost Allocation Study Technical Team Recommendation for Construction and Municipal and Industrial Benefit Methodology*.

The District looks forward to Reclamation's response to our comments and to the release of all comments and responses to these matters. The District anticipates that it will have an opportunity to review and comment on the draft cost allocation decision prior to that decision becoming final.

Please contact Mr. Stephen Farmer at 559-241-6240 or sfarmer@westlandswater.org if you have any questions or require any additional information.

Sincerely,

Dan Pope
Chief Operating Officer

Attachments

cc: David Murillo
Regional Director

Brenda Bryant
Assistant Regional Director for Business Services

Westlands Water District
Comments on CVP CAS Findings and Recommendations

Westlands Comment 10: Municipal and Industrial Benefit Methodology

References:

- Municipal and Industrial Benefit Methodology Paper: [http://www.usbr.gov/mp/cvp/cvp-cas/docs/Draft Findings/08-15-14 CVP CAS Proposed MI Benefit Methodology and Models.pdf](http://www.usbr.gov/mp/cvp/cvp-cas/docs/Draft_Findings/08-15-14_CVP_CAS_Proposed_MI_Benefit_Methodology_and_Models.pdf)

District Comments:

The Municipal and Industrial Benefit Methodology Paper discusses several tools that could be used in estimating the benefit value of Municipal and Industrial (M&I) water. The four tools are: (1) the California Municipal Demand Model (CMDM), (2) the Least-Cost Planning SIMulation model (LCPSIM), (3) Other Municipal Water Economics Model (OMWEM) and (4) information from individual water supplier water management plans and water supply master plans.

The District's position is that Reclamation should use the LCPSIM in conjunction with OMWEM to estimate M&I benefits. They are consistent with the Procedures & Guidelines, and have been used in numerous studies by both Reclamation and the Department of Water Resources.