

FIN-6.20



Westlands Water District

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January 12, 2015

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: Central Valley Project (CVP) Cost Allocation Study (CAS)
Issue Paper: Considerations on the Two Cost Allocation and Two-Period
Repayment Approach

Dear Ms. Miller-Levy:

Westlands Water District (District) has reviewed the Issue Paper: Considerations on the Two Cost Allocation and Two-Period Repayment Approach that was posted to the CVP CAS website on December 12, 2014 which proposes that the cost allocation factors resulting from the current CAS be effective either January 1, 1988 or October 30, 1992. The Issue Paper explains that these dates are appropriate because they represent major reoperation dates for the CVP and correspond to PL 99-546 Coordinated Operations Act and PL 102-575 CVP Improvement Act respectively.

Through CAS Stakeholder meetings the District along with other CVP water and power contractors have requested additional information to allow for a more informed comment on this topic. The information requested includes, in part, how proportional costs will be allocated to Water Quality and how Reclamation will be forecasting future deliveries.

The dates proposed by Reclamation are not the only significant shifts in CVP operations. Other major shifts include the 1994 Water Quality Plan (D1641) promulgated by the California State Water Resources Control Board, the December 2000 Record of Decision for the restoration of the Trinity River and its fish and wildlife populations and the 2008 and 2009 Bi-Ops decisions for Delta Smelt and Salmon. As the Bureau is well aware, each of these regulatory actions has had a significant impact on the operation of the CVP and its ability to provide a reliable water supply to South of Delta contractors.

If no other options are to be considered, the District would consider accepting October 30, 1992 for ceasing use of the existing allocation factors and implementing the updated factors based on the current CAS. However, this is not the only reasonable date that Reclamation could support based exclusively on major CVP reoperation.

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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: Jason Phillips
Deputy Regional Director

Brenda Bryant
Assistant Regional Director

David Murillo
Regional Director