



COMMENT SHEET Central Valley Project Cost Allocation Study (CVP-CAS)

Comments are welcome throughout the duration of the cost allocation effort.

Please mail comments to Brooke Miller-Levy, Bureau of Reclamation, 2800 Cottage Way, MP-730, Sacramento, CA 95825, or e-mail them to bmillerlevy@usbr.gov, or fax them to 916-978-5094.

For questions, please contact Ms. Miller-Levy at 916-978-5296 (TTY 916-978-5608).

(Please print clearly)

This personal data will be used temporarily and will not be permanently stored.

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Comment here: November 1, 2013
Date

Ms. Miller-Levy,

After attending the May 17 Cost Allocation meeting focusing on water supply, listed below are Westlands comments and inquires:

- During the presentation of the single purpose model, the presenter and power point presentation failed to include recreation. Since recreation activities impacts are considered in environmental documents and recreation activities generate revenue, a single purpose use model should be analyzed for recreation at facilities where current legislation allows it.
- As you are aware the current BiOp's affecting Delta Operations are under review and CalSim2 does not incorporate the future regulatory changes. Since this future regulatory change is known, it would be inaccurate to develop a new cost allocation with incorrect information.
- How will the single purpose sizing model account for the exchange contractors' allocation because their allocation is dependent on inflow into Shasta not reservoir storage?

See attachment A.

Attachment A: Cost Allocation Comments

- On slide 7 of the power point presentation, it states that conveyance and pumping facilities only serves the water supply purpose. This statement suggests that only agricultural and municipal and industrial contractors will be allocated costs associated with conveyance and pumping facilities, which is not correct. There are fish and wildlife refuges south of the Delta who divert water from the San Luis Canal (SLC). As you may recall, Jones Pumping Plant lifts water from the Delta into the Delta Mendota Canal and conveys water to the Mendota Pool, San Luis Reservoir and the SLC. Hence, conveyance and pumping facilities are required for multi-purpose uses not only water supply purpose. Fish and wildlife refuges have a higher priority than agricultural service contractors.
- According the methodology presented on May 17, the single purpose model will generate the total amount of water storage required for each individual reservoir. Currently the same molecule of water is used for multiple purposes. How will Reclamation account for the overlap?
 - For Example, in the fall Shasta's storage is required to meet a cold water pool of 1.9 MAF; this same water which is required for cold water pool storage is potentially released later for the benefit of temperature, water supply, water quality and hydropower generations. Once the sizing model is complete for all possible single purposes, because of overlap the sum of all uses will make each reservoir larger than it currently is. How is the overlap being accounted for in the allocation of costs?
- Will there be a technical, or select customer, review with an opportunity for comment on the details utilized and resulting CALSIM2 hydrology and delivery modeling prior to single purpose size modeling?
- In the presentation for public meeting #1 held on October 1, 2010 the evaluation phase of the project is scheduled to commence in years 4 to 5 of the study. Will this evaluation stage include customer testing and review of the results of the SCRB analysis for each facility and beneficiary?

Thank you for the opportunity to provide comments to the United States Bureau of Reclamation in this matter, if you have any additional questions please feel free to contact Katarina Buelna at 559- 241-6226.