



SHASTA COUNTY

WATER AGENCY

COUNTY OFFICE BUILDING
1855 PLACER STREET
REDDING, CA 96001
(530) 225-5661
FAX (530) 225-5667

PATRICK J. MINTURN
CHIEF ENGINEER

FPA 040509

November 17, 2010

Tammy LaFraboise
United State Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way
Sacramento, CA 95825-1898

Subject: Central Valley Project Municipal and Industrial Shortage
Policy - Working Draft (October 21, 2010)

Dear Ms. LaFaboise:

Thank you for the opportunity to participate in the development of the M&I Shortage Policy. We have reviewed the subject draft and make the following comments:

- "Term and Condition 1 is intended to encourage contractors to use non-CVP water first and rely on CVP water as a supplemental supply," which is a laudable goal from an overall systems point of view, but impractical for Contractors in Shasta County. Reclamation has claimed the most practical dam locations and population centers are not generally over high-yielding aquifers. Further, Contractors seeking transfers from more reliable sources, such as transfers from Settlement Contractors, have been blocked by concerns about "cold water pool" depletion. Contractors that have not been able to develop supplemental supplies because of geographic and environmental issues should not be discriminated against, and the Policy should so state.
- Term and Condition 2 provides a vehicle for Contractors that have made extraordinary conservation efforts to adjust supply in a dry year. To make an adjustment, a Contractor must be up to date with its UWMP. Many Shasta County Contractors have contracts below the UWMP threshold. Because these Contractors are small, both in contract quantity and resources, completing and maintaining an UWMP would be a large expense - one that their ratepayers would be unlikely to support. The adjustment provisions in Term and Condition 2 should also apply to those Contractors that can demonstrate extraordinary conservation even if they are not obliged to provide UWMP's.

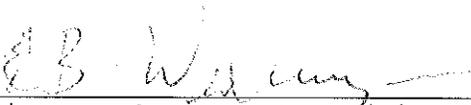
Tammy LaFraboise
United States Bureau of Reclamation
Shortage Policy - Working Draft
November 17, 2010
Page 2 of 2

- "Public health and safety" levels of supply are cited throughout the Policy, but just what is required for public health and safety is not numerically defined. If the numerical definition is expected to change, the Policy should state the current location of this criterion, not just the agency responsible for its promulgation.

Should you have questions or concerns, please contact Eric Wedemeyer at (530) 225-5181 or ewedemeyer@co.shasta.ca.us.

Very truly yours,

Patrick J. Minturn, Chief Engineer

By 
Eric B. Wedemeyer, Supervising Engineer

EBW/ldr