

CENTRAL VALLEY


**CONTRA COSTA
WATER DISTRICT**

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April 21, 2005

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Mr. David Lewis
United States Bureau of Reclamation
2800 Cottage Way, MP-730
Sacramento CA 95825

via facsimile: 916-978-5094

**RE: Comments on Draft Environmental Assessment for the Central Valley
Project Municipal and Industrial Water Shortage Policy**

Dear Mr. Lewis:

Contra Costa Water District (CCWD) appreciates the opportunity to comment on the Draft Environmental Assessment (EA) for the Central Valley Project (CVP) Municipal and Industrial (M&I) Water Shortage Policy (Shortage Policy). CCWD is the largest CVP M&I contractor and serves raw and treated water to approximately 500,000 people throughout north-central and east Contra Costa County. CCWD is generally supportive of the proposed M&I Shortage Policy and the proposed alternative in the EA. The following comments are in regards to errors in Reclamation's calculated value for CCWD's minimum public health and safety level for purposes of the EA. CCWD requests that the draft EA document be corrected prior to being finalized.

Page 3-7 Table 3-3 incorrectly indicates that CCWD's suggested per capita use factor for minimum health and safety residential use includes an allocation for commercial and industrial uses. The per capita use factor includes residential indoor use only. The following language should be deleted from line describing CCWD under the column labeled Suggested Values for Residential Use "(includes allocation for commercial and industrial uses)".

Page 4-33 The example calculation of CCWD's minimum public health and safety needs to be revised. First, the table assumes that commercial demand is included in the population figure used. This is not correct. Population represents residential customers only. Commercial demand is included in the per capita use factor of 220 gal/capita/day but is not represented in the population total. The table should be revised to indicate a per capita use factor of 190 gal/capita/day for residential demand and a total commercial demand of 21,000 acre-feet, 80% of which would be 16,800 acre-feet. This change would increase CCWD's health and safety level by 16,800 acre-feet in the table.

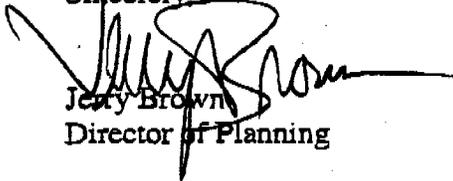
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As noted in the EA, when water allocations are reduced below 75% for M&I, Reclamation will use the greater of (1) a percentage of contract amount, versus (2) the minimum public health and safety level to determine actual allocations. CCWD understands Reclamation's calculated value for each contractor's minimum public health and safety level to be solely for purposes of the EA, and that according to the policy specific values will be developed by each contractor following execution of its long-term CVP contract. CCWD notes that its determination of the District's minimum public health and safety level is currently 65 percent of normal demand, which is documented in the CCWD Urban Water Management Plan (UWMP). The example calculation in the EA does not conform to CCWD's UWMP adopted methodology and should be revised to be consistent with it.

Please call me at (925) 688-8172 if you have any questions regarding CCWD's comments.

Sincerely,



Jerry Brown
Director of Planning

JB/JQ



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FAX TRANSMITTAL

TO: David Lewis 916-978-5094

FROM: Jerry Brown Date: 4-22-05

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Total Pages: 3
(Including cover sheet)

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**Subject: Comments on Draft Environmental Assessment for the
Central Valley Project Municipal and Industrial Water
Shortage Policy**

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