



Lower Tule River

Irrigation District

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January 22, 2014

Michelle Denning
Regional Planning Officer
Bureau of Reclamation
2800 Cottage Way, MP-700
Sacramento, CA 95825

Subject: CVC Contractors Comments on the Draft Delta-Mendota Canal/California Aqueduct Intertie Cost Allocation Information Report-Central Valley Project

Dear Mrs. Denning,

Per the Draft Delta-Mendota Canal/California Aqueduct Intertie Cost Allocation Information Report-Central Valley Project (the "Draft Report"), the purpose of the Intertie is to increase capacity at the Jones Pumping Plant. According to the Draft Report, based on modeling, Reclamation has estimated that the Cross Valley Contractors will receive an annual average agricultural water supply benefit of 4,400 acre-feet, and therefore Reclamation has proposed that the Cross Valley Contractors be allocated 15.83% of the benefits and costs of the construction of the Intertie.

The Cross Valley Contractors would like an explanation of the modeling. Neither the Draft Report nor the modeling explanation within it appear to contemplate that the Cross Valley Contractors have a first priority right pursuant to State Water Resources Control Board Water Right Decision 1641 (D-1641) and other applicable legal authority to move their water through the Banks Pumping Plant under the Joint Point of Diversion (JPOD). While in stark contrast, at Jones, the Cross Valley Contractors have a lower priority and very rarely, under extremely limited circumstances, is CVC water able to be moved through Jones. Likewise, the Intertie's purported benefits for increased storage of agricultural water supplies in the San Luis Reservoir appear to be of little or no benefit to the Cross Valley Contractors, given their extremely limited contractual rights to such storage.

Based on the foregoing, it does not appear that the Draft Report accurately states or identifies any tangible benefits that the Intertie will provide to the Cross Valley Contractors; and that it will largely benefit CVP contractors with lower pumping priority rights at Banks and higher priority rights at Jones, and with superior rights

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to storage in the San Luis Reservoir. Absent a detailed explanation of the modeling methodologies and assumptions used in making the calculations and estimates in the Draft Report, we do not feel the intertie will benefit the Cross Valley Contractors much, if at all and therefore the costs of the Intertie should not be applicable to Cross Valley Contractors.

Please contact Dan Vink at 559-686-4716 or dvink@ltrid.org, or Eric Limas at 559-686-4716 or elimas@ltrid.org, if you have any questions or to discuss this matter further.

Sincerely,



Eric Limas
Business Manager

Cc: Brenda Bryant, Regional Financial Manager, Bureau of Reclamation
Cross-Valley Contractors