

VIA EMAIL (bcnelson@usbr.gov) AND U.S. MAIL

September 29, 2015

Mr. Ben Nelson, Natural Resources Specialist
Bureau of Reclamation, Bay-Delta Office
801 I Street, Suite 140
Sacramento, CA 95814-2536

SUBJECT: Comments on the Draft Environmental Impact Statement for the Coordinated Long-Term Operation of the Central Valley Project & State Water Project

Dear Mr. Nelson:

The East Bay Municipal Utility District (EBMUD) appreciates this opportunity to comment on the Draft Environmental Impact Statement for the Coordinated Long-Term Operation of the Central Valley Project and State Water Project (DEIS). EBMUD supplies water to nearly 1.4 million people in the East Bay. EBMUD's 332-square mile water service area encompasses incorporated and unincorporated areas within Alameda and Contra Costa Counties. EBMUD's Mokelumne River and East Bay watershed sources of supply are sufficient in most years. However, to reliably meet the needs of its customers in dry years, EBMUD uses CVP water under its Long Term Renewal Contract No. 1406-200-5183A-LTR1 (LTRC) with Reclamation in addition to its Mokelumne and East Bay supplies.

Table 5D.33 of Appendix D of the DEIS tabulates water demand and supply information for EBMUD under future conditions. Information in this table appears to have been developed based on review of EBMUD's 2010 Urban Water Management Plan and Water Supply Management Program 2040 Plan. However, information is incorrect and the manner in which information is presented in this table does not accurately reflect EBMUD's portfolio approach to meeting current and future water demands or the unique nature of EBMUD's dry-year only LTRC. EBMUD's Mokelumne system is severely limited during droughts. Our CVP supply is central to our drought planning and provides a critical water supply that reduces the potential for severe water rationing and economic losses during droughts, in combination with continued use of stored Mokelumne supplies, aggressive conservation and recycling programs, and other water supplies.

EBMUD requests that Table 5D.33 be corrected as shown in the attached redlined version of the table. Based on EBMUD's understanding of the alternatives, we do not believe our water supply planning would change based on Reclamation's implementation of a preferred alternative.

We appreciate this opportunity to comment on the DEIS. If you have any questions about these comments, please contact me at 510-287-0125.

Sincerely,



Michael T. Tognolini
Manager of Water Supply Improvements

Attachment

375 ELEVENTH STREET . OAKLAND . CA 94607-4240 . FAX (510) 287-0541
P.O. BOX 24055 . OAKLAND . CA 94623-1055

1 Table 5D.33 East Bay Municipal Utility District

Items	Water Demand and Supplies (acre-feet)	Notes
Water Demand		
Service Area Water Demand	256,500 <u>349,440¹</u>	East Bay Municipal Utility District. 2011. <i>Urban Water Management Plan 2010 Document.</i> June.
Water Sales to Others	-	-
Total Demand	256,500 <u>349,440</u>	-
Water Supplies for NAA		
CVP Water Supplies	<u>Supplemental supply</u>	Up to 133,000 acre-feet in a dry year, with a maximum of 165,000 acre-feet over three dry years, CVP Water Service Contract (14-08-200-5183A-LTR1) from the American River.
SWP Water Supplies	<u>Dry year supply</u>	Up to 133,000 acre-feet in a dry year, with a maximum of 165,000 acre-feet over three dry years, CVP Water Service Contract (14-08-200-5183A-LTR1) from the American River.
Other Imported Water Supplies	-	-
Other Imported Water Supplies	241,746 <u>Up to 240,800²</u>	Up-EBMUD has up to 364,037 acre-feet of water rights on the Mokelumne River, but available amount varies depending on hydrology per East Bay Municipal Utility District. 2012. <i>Water-Supply Management Program 2040-Plan.</i> April. Assume 241,746 acre-feet based on information per East Bay Municipal Utility District. 2011. <i>Urban Water Management Plan 2010 Document.</i> June; and East Bay Municipal Utility District. 2012. <i>Water-Supply Management Program 2040-Plan.</i> April.
Local Surface Water Supplies	16,800	Water rights from local watersheds within the East Bay Municipal Utility District (EBMUD) watershed average 16,800 to 28,000 acre-feet per East Bay Municipal Utility District. 2012. <i>Water-Supply Management Program 2040-Plan.</i> April. 2011. <i>Urban Water Management Plan 2010.</i> June.
Groundwater	1,120 <u>Dry year supply</u>	<u>Up to 1,120 acre-feet in dry years.</u> Bayside Groundwater Project Phase 1 groundwater recharge facility within EBMUD service area per East Bay Municipal Utility District. 2012. <i>Water-Supply Management Program 2040-Plan.</i> April. Assume 241,746 acre-feet based on information per East Bay Municipal Utility District. 2011. <i>Urban Water Management Plan 2010 Document.</i> June; and East Bay Municipal Utility District. 2012. <i>Water-Supply Management Program 2040-Plan.</i> April.

Items	Water Demand and Supplies (acre-feet)	Notes
Recycled Wastewater	11,200 22,400 ³	11,200 acre-feet additional reclamation per East Bay Municipal Utility District 2012. Water Supply Management Program 2040 Plan. April. This value is consistent with 20,970 acre-feet in East Bay Municipal Utility District. 22,400 acre-feet from East Bay Municipal Utility District. 2011. Urban Water Management Plan 2010 Document. June.
Recycled Stormwater	-	-
Desalination ⁴	Dry year supply	<u>Up to 22,400 acre-feet in dry years from regional desalination facility; however, not anticipated until 2040 per East Bay Municipal Utility District. 2011. Urban Water Management Plan 2010 Document. June.</u> -
Transfers/Exchanges ⁴	Dry year supply	<u>5,040 to 49,952 acre-feet in dry years. Transfers from Northern California water users per East Bay Municipal Utility District. 2012. Water Supply Management Program 2040 Plan. April.</u>
Conservation	35,580 69,440 ⁵	35,850 acre-feet from permanent conservation programs per East Bay Municipal Utility District. 2012. Water Supply Management Program 2040 Plan. April. This is greater than projections of 25,227 EBMUD's Water Conservation Master Plan is based on 69,440 acre-feet conservation in 2040, per East Bay Municipal Utility District. 2011. Urban Water Management Plan 2010 Document. June. Up to 38,500 acre-feet could be saved from 15 percent rationing during droughts or emergencies as compared to UWWMP demand projections for 2030. However,
<u>Bayside Groundwater Project Phase 2</u> ⁴	<u>Dry year supply</u>	<u>2,240 to 10,080 acre-feet in dry years. Bayside Groundwater Project Phase 2 per East Bay Municipal Utility District. 2011. Urban Water Management Plan 2010 Document. June.</u>
<u>Groundwater Banking outside of EBMUD service area</u> ⁴	<u>Dry year supply</u>	<u>Dry year supply of 4,704 acre-feet of groundwater banking in Sacramento Valley and/or 19,500 acre-feet in San Joaquin Valley; not anticipated until 2040 per East Bay Municipal Utility District. 2012. Water Supply Management Program 2040 Plan. April.</u>
<u>Enlarge Lower Bear Reservoir</u> ⁴	<u>Dry year supply</u>	<u>Up to 4,500 acre-feet in dry years; however, not in plan for 2030 per East Bay Municipal Utility District. 2012. Water Supply Management Program 2040 Plan. April.</u>

<u>Expand Los Vaqueros Reservoir⁴</u>	<u>Dry year supply</u>	<u>Exact amount available to be determined and additional study needed per East Bay Municipal Utility District. <i>Urban Water Management Plan 2010. June.</i></u>
Total <u>Future</u> Water Supplies for NAA	349,440⁶ (<u>non-dry years</u>)	Does not include CVP water supply for dry years or, up to 15 percent rationing in dry years, <u>or other dry year supply projects.</u>
Possible Future Water Supplies		
Bayside Groundwater Project Phase 2	10,080	Bayside Groundwater Project Phase 2 per East Bay Municipal Utility District. 2012. <i>Water Supply Management Program 2040 Plan. April. Requires further study and environmental analyses.</i>
Groundwater Banking outside of EBMUD service area	-	Includes 4,704 acre-foot of groundwater banking in Sacramento Valley and/or 19,500 acre-foot in San Joaquin Valley; not anticipated until 2040 per East Bay Municipal Utility District. 2012. <i>Water Supply Management Program 2040 Plan. April.</i>
Transfers	14,560	Transfers from Northern California water users per East Bay Municipal Utility District. 2012. <i>Water Supply Management Program 2040 Plan. April.</i>
Regional Desalination Facility	-	Up to 22,400 acre-foot from regional desalination facility; however, not anticipated until 2040 per East Bay Municipal Utility District. 2012. <i>Water Supply Management Program 2040 Plan. April.</i>
Enlarge Lower Bear Reservoir	-	Up to 4,500 acre-foot; however, not in plan for 2030 per East Bay Municipal Utility District. 2012. <i>Water Supply Management Program 2040 Plan. April.</i> Enlargement of Pardee Reservoir is not included in the recommendations of the East Bay Municipal Utility District. 2012. <i>Water Supply Management Program 2040 Plan. April.</i>
Expand Los Vaqueros Reservoir	6,700	Up to 6,700 acre-foot per East Bay Municipal Utility District. 2012. <i>Water Supply Management Program 2040 Plan. April.</i>
Subtotal Potential Future Water Supplies	-	All future projects not included for M&L-No Action Alternative assumptions since some of the future projects are not fully defined or analyzed.
Total Potential Future Water Supplies	306,446	Does not include CVP water supply for dry years or up to 15 percent rationing in dry years.

Notes:

1 Represents EBMUD's projected 2040 demand.

2 "Other Imported Water Supplies" include EBMUD's entitlements on the Mokelumne River. Although EBMUD has water rights up to 364,037 acre-feet, the actual amount available in any given year varies depending on hydrology, required releases to senior downstream water rights holders, and releases to meet instream flow requirements.

3 EBMUD's goal is to deliver 22,400 acre-feet of recycled water by the year 2040.

4 EBMUD has identified a range of water supply projects that it will pursue simultaneously to meet future water needs. By considering a broad mix of projects, with inherent scalability and the ability to adjust implementation schedules for a particular component, EBMUD will be able to minimize the risks associated with future uncertainties such as project implementation challenges and climate change. If EBMUD is able to successfully develop one component, this could result in deferral of other additional water supply components over the planning period.

5 EBMUD's goal for conservation is 69,440 acre-feet by the year 2040.

6 During normal years EBMUD anticipates having sufficient supplies to meet demands. Meeting customer demands during dry years will depend on the use of CVP supplies, rationing, and the implementation of additional water supply projects.