



November 30, 2015

Board of Directors
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General Manager Jerry Brown

The Honorable Felicia Marcus, Chair and Members of the State Water Resources Control Board c/o Jeanine Townsend, Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814

SENT VIA EMAIL TO: commentletters@waterboards.ca.gov

Subject: Comment Letter - Drought Emergency Regulations

Dear Chair Marcus and Members of the Board:

The Contra Costa Water District (CCWD) appreciates the opportunity to provide input and recommendations for the State Water Resources Control Board's (State Board) consideration of the potential extension and modification of the Emergency Regulation for Statewide Urban Water Conservation.

CCWD is committed to conservation and to doing its part during this statewide emergency. The District has been a leader in water conservation for more than 20 years and is currently exceeding its drought emergency savings goal of 28%.

CCWD supports and is a party to the comment letter provided by the California Urban Water Agencies. CCWD feels it is necessary, however, to make an additional request, considering the recent expansion of our surface storage reservoir, a project that included as one of its primary purposes, drought reliability for the region. One of the water agency proposals for adjusting the emergency regulations for 2016, if the regulations continue, involves allowing credit for development of sustainable supplies. CCWD would like the Board to consider our surface storage development as part of its review of this proposal for the following reasons. CCWD has been proactive in water supply planning to ensure its customers have a sustainable and reliable water supply. CCWD completed the 100,000 acre-foot Los Vaqueros Reservoir in 1998. Water is stored in the reservoir and used for supply and blending when source water from the Sacramento-San Joaquin Delta does not meet CCWD's delivery standards. In 2012, CCWD completed the expansion of the Los Vagueros Reservoir to 160,000 acre-feet with a key objective of adding storage to provide for drought resiliency and protection. (See attached Project Objectives from the project's Environmental Impact Statement/Environmental Impact Report.) This \$120 million project was primarily funded by CCWD rate payers, who expect to realize the benefits from this project.



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CCWD respectfully requests that the State Board acknowledge CCWD's significant investment in expanding Los Vaqueros which was made in part for water supply reliability. The value of this investment should be recognized and attributed to the local ratepayers by reducing CCWD's drought emergency savings goal.

Thank you for your consideration of this request.

Sincerely,

Jerry Brown General Manager

JB/CD:jc

Attachment

ATTACHMENT

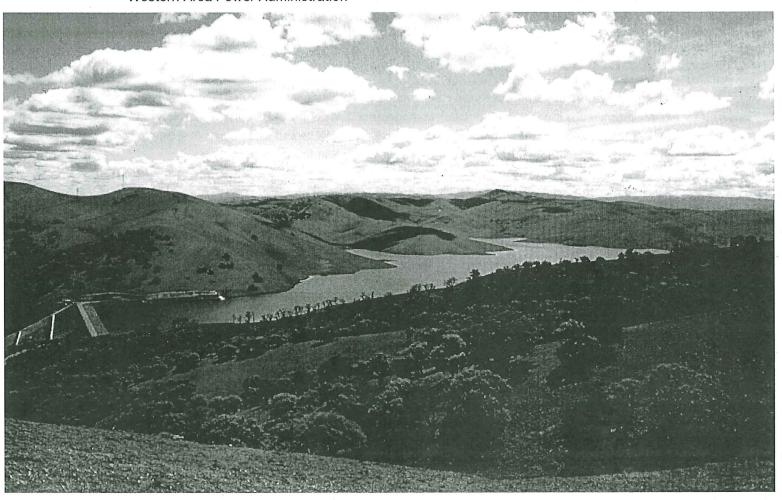
FINAL - Volume 4 of 4

LOS VAQUEROS RESERVOIR EXPANSION PROJECT

Environmental Impact Statement Environmental Impact Report State Clearinghouse No. 2006012037

Prepared for
United States Department of the Interior
Bureau of Reclamation
Mid-Pacific Region
Contra Costa Water District
Western Area Power Administration

March 2010









1.2 Project Objectives

The Los Vaqueros Reservoir Expansion Project objectives are to use an expanded Los Vaqueros Reservoir system to:

Primary Objectives:

- Develop water supplies for environmental water management that supports fish protection, habitat management, and other environmental water needs.
- Increase water supply reliability for water providers within the San Francisco Bay Area, to help meet municipal and industrial water demands during drought periods and emergencies or to address shortages due to regulatory and environmental restrictions.

Secondary Objective:

• Improve the quality of water deliveries to municipal and industrial customers in the San Francisco Bay Area, without impairing the project's ability to meet the environmental and water supply reliability objectives stated above.

In addition to these objectives, CCWD Board of Directors' Resolution No. 03-24 provides important guidance for identifying and evaluating plans involving the expansion of the reservoir (CCWD, 2003). The CCWD Board Principles are discussed in detail in Chapter 2.

1.3 Purpose and Need

The primary project purpose is to use an expanded Los Vaqueros Reservoir system to develop water supplies for environmental water management that supports fish protection, habitat management, and other environmental water needs in the Delta and tributary river systems, and to improve water supply reliability for urban users in the San Francisco Bay Area.

The need for this project is driven by the following conditions:

- The Delta ecosystem is in a state of serious decline, with primary productivity very low and fish populations decreasing to record low levels, putting at least one species (the delta smelt) on the brink of extinction.
- Insufficient quantities of water and lack of storage and flexibility in managing the timing and location of diversions for environmental and municipal water supplies are contributing to the ecosystem's decline.
- Ecosystem decline has put other beneficial uses of water supplies conveyed through the Delta at risk, leading to court-ordered limits on Delta pumping and greatly reducing water supply reliability for millions of people.

Improved storage and conveyance of environmental water supplies can help to improve Delta ecosystem conditions and reduce conflict among beneficial uses of Delta water supplies.