May 12, 2014

BDCP Comments
Attn: Ryan Wulff, NMFS
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814

VIA EMAIL: BDCP.Comments@noaa.gov

Dear Mr. Wulff,

Olivenhain Municipal Water District is a public agency in northern San Diego County that provides 80,000 customers with water, wastewater, recycled water, hydroelectric, and recreational services. OMWD currently purchases all of its potable water supply from the San Diego County Water Authority, which in turn is a member agency of Metropolitan Water District of Southern California, a State Water Contractor.

We are thankful for the opportunity to comment on the Public Review Draft of the Bay Delta Conservation Plan and the associated Public Review Draft Environmental Impact Report/Environmental Impact Statement. On OMWD’s behalf, I am writing to express support for the Bay Delta Conservation Plan, and specifically Alternative 4 as identified in the EIR/EIS.

The Sacramento-San Joaquin Bay-Delta represents a critically important portion of water supply for both the State of California and San Diego County. Its future as a source of potable water, however, is far from secure, which is especially troubling given the ongoing severity of California’s statewide drought. Significant near-term action is required to achieve the co-equal goals of water reliability and environmental restoration.

State and federal officials have positively responded, carrying out a thorough planning process, with a clear vision of the future. OMWD has supported the planning process and applauds the diligent work that has been completed to date that will assist in completing solutions to delta-related challenges. Our review of the draft BDCP and EIR/EIS has confirmed for OMWD that the project’s preferred alternative, Alternative 4, represents the framework for a well-founded and viable solution to these challenges.

Of course, it remains essential to complete the public review and environmental processes to more accurately define the ultimate project. The culmination of these processes will be achievement of a final EIR/EIS, record of decision, and the division of costs between participants. While we look forward to the issuance of a detailed financing plan for the BDCP, we
understand that the documents under review are environmental in nature and do not represent a financing plan; the planning process should thus not be held up until such time as each dollar has been secured.

OMWD would like to point out that water users in San Diego County—one of the state’s most populous urban areas—will be expected to make significant financial contributions to the BDCP. It is our understanding that, though cost allocation discussions are underway with State Water Contractors, the only representation in these discussions for subcontractors like the San Diego County Water Authority are through their respective contractor. This is troublesome in San Diego’s case given that, as you may be aware, SDCWA is currently engaged in litigation with Metropolitan Water District of Southern California over the latter's rate structure. Similarly, there are considerable concerns on the part of SDCWA over how the BDCP’s costs will be allocated among Metropolitan’s member agencies. Therefore, OMWD strongly suggests that it would be appropriate for SDCWA to be afforded the opportunity to engage state officials on this matter via more direct channels so that its voice can be more effectively represented.

Thank you for consideration of these comments. If you or your staff should need any additional information regarding our assessment of the Bay Delta Conservation Plan, please contact me or OMWD’s General Manager, Kimberly Thorner, at 760-753-6466.

We look forward to the completion of the BDCP planning process and, ultimately, its implementation, ensuring greater water supply reliability throughout California for generations to come.

Regards,

[Signature]

Lawrence A. Watt
President, Board of Directors

CC: Ollivenhain Municipal Water District Board of Directors
Maureen Stapleton, San Diego County Water Authority
Boards of Directors, all San Diego County Water Authority member agencies
Assemblywoman Marie Waldron
Assemblyman Rocky Chavez
Assemblyman Brian Maienschein
Assemblywoman Toni Atkins
Senator Mark Wyland
Senator Marty Block
Board of Supervisors, County of San Diego
City Council, City of Encinitas
City Council, City of Carlsbad
City Council, City of San Diego
City Council, City of San Marcos
City Council, City of Solana Beach