July 1, 2014

BDCP Comments
Ryan Wulff, National Marine Fisheries Service
650 Capitol Mall, Suite 5-100 Sacramento, CA 95814

Re: Comment on Bay Delta Conservation Plan

Dear Mr. Wulff:

The San Diego County Taxpayers Association (SDCTA) is a non-profit, non-partisan organization, dedicated to promoting accountable, cost-effective and efficient government and opposing unnecessary taxes and fees. Recognizing the economic importance of water, SDCTA is proud to be a regional leader in water research and advocacy. As Co-Chair of the Water Reliability Coalition and as San Diego’s chief ratepayer advocate, SDCTA provides leadership in advocating for reliability and ratepayer protections.

On behalf of SDCTA, I would like to invite the California Natural Resources Agency to respond to the specific questions outlined for further SDCTA analysis regarding the Bay Delta Conservation Plan (BDCP).

A. Please identify the methodology used for determining the preferred conveyance size:
   a. Please include where and how the increased conservation anticipated as a result of rate increases is reflected in the methodology.
   b. Please include where and how the increased local supply development incentivized by lessening the cost differential between imported water and local supply development is reflected in the methodology.
   c. Please include where and how the tolerance of ratepayers to invest in local supply development given the higher rates is reflected in the methodology.

B. How does the conveyance sizing account for local projects that are planned across the state? Specifically, if all planned local projects are successfully constructed, how would demand for imported water compare to the state’s capacity to import it?

C. While it is understood by SDCTA that the existing analysis is an environmental process, the feasibility and success of the project will in part be determined by financing mechanisms available. What assurances are offered that planned financing mechanisms will reflect dynamic projections as described in item ‘A’?
D. While it is understood by SDCTA that the existing analysis is an environmental process, the feasibility and success of the project will in part be determined by financing mechanisms available. What assurances are offered that rate increases and allocation will be fair, appropriate and competitive with local potable water sources and conservation?

E. For each of the conveyance sizes studied, to what degree is water reliability out of the Bay Delta increased through managing habitat?

F. For each of the conveyance sizes studied, to what degree is the drinking water system protected from seawater contamination that could result from a major earthquake.

If you have any questions, please feel free to contact me at (619) 234-6423 or sean@sdcta.org.

Sincerely,

Sean Karafin
Economic Policy Analyst