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Comm. Dev. Dept. Brisbane

June 25, 2013

Mr. John Swiecki, AICP
Community Development Director
City of Brisbane
50 Park Place
Brisbane, CA 94005

RE: Baylands Development- Draft CEQA Document Comments

Dear Mr. Swiecki:

Oakdale Irrigation District (OID) appreciates the opportunity to respond with comments to the City of Brisbane's Draft Environmental Impact Report for the Baylands Development Project. OID is providing the following comments based upon its initial review of the document. More comments may be forthcoming as we review the document in detail, but OID felt an early response to some minor issues would help to clarify details of the water supply being provided for this project. OID's comments are specific to Volume 4, Appendix L, Water Supply Assessment, Section 4-Water Supplies:

Page 4.5, Section 4.3.3

The second sentence in this section reads, "The proposed Agreement between the City and OID would guarantee the transfer of up to 2,400 acre-feet per year (AFY), without restrictions on permitting from the State Water Resources Control Board, for a term of 50 years."

For clarity, OID would prefer the following re-write of that sentence to be, "The proposed Agreement between the City and OID would guarantee the transfer of up to 2,400 acre-feet per year (AFY) for a term of 50 years."

The term sheet does not contemplate any State Water Resources Control Board approvals for this transfer.

Page 4.6, Section 4.3.3

This first paragraph has a number of clarifying corrections. OID would propose a re-write of that paragraph to read as follows:

“OID is located in the northeast portion of the San Joaquin Valley within Stanislaus and San Joaquin Counties. The majority of OID’s water supplies come from a mix of pre-1914 adjudicated and post-1914 appropriative water rights. Pursuant to the 1988 Stipulation and Agreement between OID and South San Joaquin Irrigation District (SSJID) and the United States Bureau of Reclamation, OID has the ability, with SSJID, to divert the first 600,000 acre feet of flow in a water year on the Stanislaus River. OID’s water is diverted out of the river at Goodwin Dam upstream of the city of Oakdale. To effectuate the water transfer to Brisbane, OID would physically deliver up to 2,400 AFY of water into the Modesto Irrigation District (MID) system, via existing facilities (i.e., released from OID’s Claribel Lateral, generally located just east of the Albers Road and Dusty Lane intersection, south of the city of Oakdale, into MID’s Main Canal). MID would make use of the 2,400 AFY for irrigation purposes and in turn credit an equivalent amount in storage in New Don Pedro Reservoir, located on the Tuolumne River northeast of LaGrange. Through a similar exchange, MID would forego delivery of 2,400 AFY from the SFPUC’s Hetch Hetchy system, which generally runs from the Sierra Nevada in Yosemite National Park through the Central Valley and South San Francisco Bay to San Francisco. The SFPUC has a water bank account in New Don Pedro Reservoir (in Tuolumne County), from which MID would credit the SFPUC with the annual amount provided by OID to the City, up to the maximum 2,400 AFY. The SFPUC would, in turn, deliver up to 2,400 AFY from its regional water supply system to the City using its existing water supply infrastructure and operational plans.”

OID thanks you for the opportunity to have made these comments. Should you have any questions on what is presented, please contact our offices. We look forward to working with you further and providing additional comments, as may be necessary, during the public review phase of this document.

Sincerely,
OAKDALE IRRIGATION DISTRICT



Steve Knell, P.E.
General Manager

SK;lfp