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Rebuttal Testimony of Steve Macaulay

Late on May 2, Board member Spivey-Weber asked if increased supplies resulting from implementation of the Project would result in decreased deliveries of imported water. She also asked about the use of data (particularly conservation information) from urban water management plans in the Muni/Western Project Description. Board members asked if we could provide information from urban water management plans that address this issue and how this was treated in Project analyses, since such plans include forecasts of future demands and water supplies.

The Final EIR, Muni-Western Exhibit 4-4 at page 2-61, states that the water supply modeling was based on information in the Urban Water Management Plans – initially using the 2000 Plans and subsequently recalculated using information from the 2005 Plans.

I reviewed Western’s 2005 Urban Water Management Plan. The Muni and Western water right applications that are the subject of this hearing are referenced in the Plan. A statement is made that such diversions would be “...replacing water that would otherwise be met by imported water or groundwater” (Page 14). It also appeared to me that the Urban Water Management Plan future water supply mix assumes benefits from this Project.

I then consulted Jack Safely’s written testimony, Muni-Western Exhibit 7-1, and have two slides that display important information already in the record of this proceeding. Table 2, page 2 of that exhibit displays the projected average imported water demand with the Project for both Muni and Western. Table 3, page 3 of that exhibit shows the projected average imported water demand without the Project. Both are displayed on this slide so that you can more easily compare the tables. You can see that that the Project is assumed to decrease imported water demand for both Muni and Western.

1 This final slide is Figure 7 from Exhibit 7-1. This graphic shows a “with and without
2 project” representation of water supplies during a year like 1968-69, when there would be
3 up to 198,000 acre-feet put to use by Muni and Western. I’ll quote from Mr. Safely’s
4 written testimony, Exhibit 7-1, page 9 at lines 5 through 9: “Water diverted from the
5 Santa Ana River would offset the need for imported (water) from the State Water Project
6 and from the Colorado River. Figure 7 illustrates in graphic form the significant benefit
7 derived from project when comparing the amount of imported water required for the No
8 Project and with Project alternatives.”

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10 On the more general question of use of information from the urban water management
11 plans, the draft and final Environmental Impact Report used data from the most recent
12 published reports from urban water purveyors in each of the service areas. Therefore, the
13 Draft EIR, published in 2004 was based on information contained in the 2000 Urban
14 Water Management Plans. The Final EIR, certified in 2007, contained information from
15 the 2005 Urban Water Management Plans.

16

17 One additional point that merits reinforcement was handled in only summary fashion in
18 my abbreviated presentation. The Project has had at the outset a built-in assumption of
19 10 percent conservation savings. This assumption was clear in the EIR, both in the draft
20 and final. This point was also mentioned in replies to comments on the DEIR. Muni and
21 Western believe this additional degree of additional conservation above current levels is
22 reasonable and appropriate.