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May 24, 2011

Edwin Pattison
Water Resources Manager
CCWD
P.O. Box 846
San Andreas, CA 95249

RE: CPC Comments on the Draft Urban Water Management Plan 2010.

Dear Ed,

My name is Tom Infusino, and I am providing these comments on the Draft Urban Water Management Plan 2010 on behalf of the Calaveras Planning Coalition. The Coalition is a group of community organizations and individuals who want a healthy and sustainable future for Calaveras County. We believe that public participation is critical to a successful planning process. United behind eleven land use and development principles, we seek to balance the conservation of local agricultural, natural and historic resources, with the need to provide jobs, housing, safety, and services.

I. Recommendation

I hope that you will review these comments and schedule a time to meet with CPC representatives to see if we can resolve these issues prior to your Board's approval of the plan in June. While we do not expect that we will see eye to eye on every issue, we would like to identify those areas of agreement on which we can collaborate in the future. If local interest can pull together on at least some of the issues addressed in the UWMP, together we can secure the water the future will need for the full spectrum of beneficial uses.

II. General Review of the Draft Urban Water Management Plan 2010

In Attachment 1 there is a general overview of what seems adequate and what seems missing from the Draft 2010 UWMP. Answers to some of these questions may be in the appendices or in other CCWD reports. If so, perhaps these other document could be included in the appendices of the UWMP, and put on the CCWD website for public review.

III. Specific Review of the Draft Urban Water Management Plan 2010

A) Chapter 1:

Page 1-1: The report states that:

“Since the 1990s, and up to the recent economic down-turn, Calaveras County experienced some of the fastest growing population rates in the State. According to the California Department of Finance records, the average annual growth rate from the early 2000s grew approximately 10-percent per year, with most of the increase occurring on the County’s western boundary coincident with the San Joaquin Valley.”

Please provide the reference to the data supporting the assertion that the County’s **average annual growth rate** grew 10% per year. Also, identify the base rates so that this increase can be put in context. (A ten percent increase from 1.0 to 1.1 percent AAGR is not as significant as an increase from 4.0 to 4.4% AAGR)

Different sources on Calaveras County population provide slightly differing yet consistent figures. From 2000 to 2005, the countywide population increased **a total** of 10.5 %, from 40,544 to 44,796. (Calaveras County, 2007 Regional Transportation Plan, p. ES-i.) Census data indicates the county population grew 12.4% during the ten year period since the 2000 Census.

While population growth has occurred in Calaveras County, the data we have seen reflected average annual growth rates as follows: 4.3% 1970-1980; 4.4% 1980-1990; 2.4% 1990-2000; and 1.45% 2000-2009. (Calaveras County, General Plan Update Alternatives Report, February 2010, p. 8; Calaveras County, Public Review Draft General Plan Baseline Report; p. 2-1.) These growth rates are sufficiently fast. A growth rate of 1.45% doubles the county’s population in 48 years. A growth rate of 2.4% would double the county’s population in less than 30 years. A growth rate of 4.4% would double the county population in 16 years. Please revise the sentence in the report to reflect the trends in the data, not just the peaks. It is important that the numbers used in this report are consistent, accurate and defensible.

Page 1-2: The report states:

“As a part of the General Plan Update effort, CCWD funded a regional collaborative effort to develop a Water Element that recognizes the important interface between water and land use planning. The water element is intended as a land use planning guide for the efficient use of water, water management, water quality protection, and recycling (Water Element Goals & Policies Report, February 2009).

The CPC and its member groups participated in the Water Element effort and wish to applaud CCWD for its leadership. As you may recall, the consideration of many CPC comments was postponed until later phases of the General Plan Update process. The

CPC hopes to meet with CCWD staff to get their views on possible improvements to the draft water element as the General Plan Update proceeds.

Page 1-2: The Report States:

“New agricultural development in Calaveras County, relatively unique compared to the rest of California, requires a reliable water supply and is projected to be a significant new water demand for the District.”

What makes the new agricultural development in Calaveras County relatively unique compared to the rest of California?

We at the CPC support sustainably enhancing the economic viability of agriculture in Calaveras County. The degree to which new agricultural development in Calaveras County will result in significant new water demand will depend not only upon the reliability of the supply but also its price. Thus a reliable water supply that has partners to share the cost may better serve agriculture than a water supply for which agricultural enterprises are expected to pay the entire cost.

For example, reclaimed waste water or filtered storm water runoff provided to an agricultural enterprise has three beneficiaries: it provides an alternative to stream discharge for the sanitary district, it provides an opportunity for the water district to secure extension of water permit deadlines, and it provides added value to the agricultural product. If all three of the beneficiaries paid some of the costs, then the agricultural enterprise may be able to secure water at a price that makes the irrigation investment financially feasible. In addition, by integrating the agricultural water supply and the urban supply, we avoid their competition for water. As long as there is urban wastewater, there will be a reliable agricultural water source.

On the other hand, if an expensive diversion, storage, and distribution facility is needed to supply water for agriculture, and the costs are not spread to others, the price of the water will likely be too high to make the irrigation investment profitable. If the water is only available to agriculture until residential demand increases, the growth in irrigated agriculture will not be sustainable. At the CPC, we do not want agriculture water use to be subsidized in the short-term merely to maintain county water rights, only to be priced out of the market in the long-term as residential water demand grows.

We encourage CCWD not only to identify the demand for irrigation water from potential irrigation customers, but also to identify their location, the products they are likely to grow, the water demand requirements for those products, their viable water price, and their water quality needs. This information will help us to identify opportunities to match suitable water supplies to suitable customers.

Page 1-2: The report states:

“The District is participating in regional watershed studies to help improve water quality and aquatic habitat conditions.”

The CPC applauds your efforts in this regard. While we realize that in-stream flow requirements reduce your available supply for other beneficial uses, we want CCWD to know that the improvement of water quality in local streams and rivers is a valuable **benefit** to the CCWD ratepayers who also use those streams and rivers for fishing, swimming, wading, boating, and other recreation. We hope that CCWD will not view the use of water for fish, wildlife, and recreational uses as a total loss. Furthermore, developing water for these beneficial uses, by negotiating storage and release agreements with existing storage facilities, may provide CCWD with the most cost-effective and expedient method of putting the unused water under its permits to a beneficial use.

Page 1-8: The report states:

“The Mokelumne River Forum (Forum) was developed to coordinate its member’s endeavors to increase in the availability and reliability of water resources from the Mokelumne River watershed. The Forum, whose participants cover a broad range of interest groups, works through cooperation, open communication, and consensus building.”

“A number of work products have been developed to help frame the issues, key among these work products is the Inter-Regional Conjunctive Use Project (IRCUP) highlighted in the 2009 California Water Plan Update (See Figure 1-4).”

We note that to date, the Forum has not been successful at reaching consensus, recruiting a broad range of interests groups (all MOU signatories are water agencies), or stemming the tide of unilateral actions by forum members adverse to the interests of other members. For example, the proposed IRCUP Terms and Conditions Agreement approved by EBMUD includes as part of IRCUP the expansion of Pardee Reservoir and the construction of the Duck Creek Reservoir. Both of these projects are strongly opposed by forum observer/attendee Foothill Conservancy, because of their impacts on fish and wildlife, recreation and tourism, public safety, working agricultural lands, and cultural resources. In fact, the Foothill Conservancy took EBMUD to court over the inclusion of the Pardee Reservoir Expansion in EBMUD’s 2040 Water Supply Management Plan.

The CPC agrees that the Forum has the potential to someday serve as a conflict resolution mechanism for the broader spectrum of stakeholders inherent in our regional water management (cities, counties, recreation and tourism businesses, riparian landowners, conservation groups, fishermen, etc.), but it is far from that today. In addition, this year, the Upper Mokelumne River Watershed Authority will be developing a Collaborative Decision Making Plan to address stakeholder concerns associated with IRCUP. It remains to be seen whether the conflict resolution potential of these efforts will be realized.

Page 1-10: The report states:

“CCWD’s emphasis on regional planning and collaboration will continue through these and other regional planning efforts. The District actively seeks additional regional planning opportunities and potential partners as it addresses the many issues confronting the District, the County, and its watersheds.”

We hope that this statement is true. The development of the UWMP 2010 has been on a very tight timeframe. This is understandable given new statutory requirements and DWR guidance. Nevertheless, the time for public review of this plan has been very short prior to CCWD’s May 25 public hearing on the plan. We at the CPC welcome the opportunity to meet with CCWD staff to discuss and resolve the issues we have raised in these comments prior to the approval of the Urban Water Management Plan 2010 by the CCWD Board in June. This would give us the opportunity to provide more supportive comments when you submit your plan to DWR.

Page 1- 11: The report states:

“CCWD continues to coordinate the preparation of this plan and other planning efforts with other appropriate agencies in the area, including other water suppliers that share a common source, water management agencies, and relevant public agencies, to the extent practical.”

It is good that CCWD has reached out to these other entities listed in Table 1-3, mostly by notifying them of the availability of the draft plan. However, CCWD’s planning efforts would benefit from an influx of data and information from these agencies (e.g. LAFCO’s 4/15/11 Public Review Draft Municipal Service Review) and from other stakeholders.

Information from other agencies would help to enlighten CCWD regarding the serious constraints to development in Calaveras County. For example, the 20-year Regional Transportation Plan for Calaveras County, prepared by the Council of Governments, indicates that projected revenue to build the \$491 million road system needed to accommodate another 20,000 people over 20-years (2005-2025) is underfunded by \$212 million, or 43%. (Calaveras County, 2007 RTP, pp. ES-I, 61, 125, 127.) By coordinating with COG, County Planning, owners of planned local developments, and concerned citizens, CCWD could better identify the likely amount, location, and timing of future water demand. By balancing CCWD’s future infrastructure investment with that of other service providers, CCWD could prioritize future infrastructure projects, and design their capacity to reduce premature expenditures. Put another way, if we can’t afford to build the roads for an additional 20,000 people in 20 years, what is the point of building the water infrastructure for 20,000 in 20 years. If we **can** afford to build the infrastructure for 11,000 people in 20 years, let’s make planning for those infrastructure projects a priority.

Information from other water and sanitation agencies could help CCWD identify water conservation and reclamation opportunities that could help to both enhance our water supply in the short term, and to secure extensions of water permit deadlines in the long term.

Finally, other stakeholders, whose cooperation may be helpful in future project implementation (e.g. ratepayer groups, conservation groups, and property right advocates), could help CCWD to identify and prioritize future projects. If we can learn anything from the mistakes made by the Amador Water Agency with their Gravity Supply Line project, we should learn that you need buy-in from the people you serve to make your water projects a success.

B) Chapter 2:

Page 2-3: The report states:

“A raw water demand receiving renewed attention for this area is agricultural. Potential agriculture customers are in discussions with the District regarding proposed water demands and infrastructure requirements to serve those demands. Because of the critically overdraft East San Joaquin Groundwater Sub-basin, dropping groundwater levels and deteriorating groundwater quality, these potential agricultural raw water demands are now included in District planning as the County looks to diversify its economic base.”

As noted previously, we at the CPC support enhancing the economic viability and sustainability of agriculture in Calaveras County. In planning for irrigation, we believe that CCWD must be cost conscious. We hope that CCWD will look beyond merely providing raw water, to consider matching the irrigation water quality need with the water source. We hope that CCWD will consider groundwater recharge in addition to piped delivery. Water reclamation and conjunctive use can assist CCWD in extending water permit deadlines, and can help to spread the cost of irrigation, and can reduce concerns regarding growth inducing nature of extending raw/potentially potable water supply lines into agricultural areas. Finally, at the CPC, we do not want agriculture water use to be subsidized in the short-term merely to maintain county water rights, only to be priced out of the market in the long-term as residential water demand grows.

Page 2-3: The report states:

“The area is expected to experience more growth, nearly doubling its existing number of dwelling units between now and 2050.”

The County estimates a population increase of 2,000 to 3,000 people from 2005 through 2035 in the Rancho Calaveras, Valley Springs, and Wallace areas. (Calaveras County, General Plan Update Alternatives Report, 2007, p. 56.) This timeframe is closer to the 20 year timeframe of the Urban Water Management Plan. As noted previously, this estimate may be overstated, since it is not tempered by the inability of the County to provide services to accommodate this level of development.

In water planning there is harm associated with overestimating the rate of demand increase. First, you may oversize infrastructure, creating unnecessary cost burdens on ratepayers and impediments to growth (see Amador Water Agency's debt burden for Amador Transmission Pipeline). High participation rates are not a growth attractant. Second, you may fail to plan for enough other ways to promptly move your permitted water to another beneficial use. If the water does not go to residential customers in a timely fashion, you need to have other convenient beneficial uses lined up, including fish and wildlife. Third, if you overestimate residential demand, you may fail to plan for sufficient conservation, reclamation, and conjunctive use projects to help extend your water permit deadlines. The CPC encourages CCWD to have contingencies planned to maintain permitted water in the event that growth does not proceed at the pace CCWD anticipates.

Page 2-5: The report says:

“The planning area is also expected to experience substantial growth over the next 40 years, with an ultimate equivalent single family unit connection total of near 16,000 in the planning area, compared to the approximately 2,500 connections in 2010.”

The County estimates an increase of roughly 8,000 to 9,000 housing units and 400 – 700 jobs in the Copperopolis area from 2005 through 2035. (Calaveras County, General Plan Update Alternatives Report, 2007, p. 56.) This timeframe is closer to the 20 year timeframe of the Urban Water Management Plan. Similarly, CCWD estimated about 5000 additional EFSUs (Equivalent Single Family Units) in this area from 2010 to 2025. (CCWD, Water Supply Assessment Tuscany Hills Project/Copper Cove Service Area, 2005, pp. 5-8.) As noted previously, this estimate is not tempered by the inability of the County to provide services to accommodate this level of development. In water planning there is harm associated with overestimating the rate of demand increase. The CPC encourages CCWD to have contingencies planned to maintain permitted water in the event that growth does not proceed at the pace CCWD anticipates.

Missing from this section of the report is the shocking increase in water demand per residence in the Copper Cove area of the County. Water use in the Copper Cove Area has increased from 0.34 AFA (acre-feet per annum) demand per ESFU to 0.56 AFA/ESFU. CCWD expects this trend to continue, and uses 0.70 AFA/ESFU for planning purposes. Much of the increase is due to water-intensive urban landscaping. (CCWD, Water Supply Assessment Tuscany Hills Project/Copper Cove Service Area, 2005, pp. 6.) This affluent and hot area of the county seems to be primed for a program to promote drip irrigation, lawn replacement, and xeriscape techniques. With County cooperation, such techniques could even be incorporated into the design standards section of the proposed community plan. Please consider putting these actions in your final plan.

Page 2-5: The report states:

“Agricultural raw water supply is also under consideration for this area. As interest and requests are made to CCWD, CCWD is looking to meet these demands through partnerships to diversify its rate base and help diversify the County’s economy and agricultural base. Potential agriculture customers represent approximately 10,000 acres in the Salt Springs Valley and nearby areas.”

As noted previously, we at the CPC support sustainably enhancing the economic viability of agriculture in Calaveras County. We hope that CCWD will look beyond merely providing raw water to consider matching the irrigation water quality need with the water source. For example, if some of the agricultural customers are the nearby cattle ranches; wastewater effluent may be of sufficient quality to irrigate pasture for grazing, or to irrigate a crop of supplemental cattle feed. Such water reuse was practiced in Jackson in Amador County almost a century ago, and was so valuable as to warrant mention in real property deeds. (e.g. Deeds for Busi Ranch.) Water reclamation can assist CCWD in extending water permit deadlines, can help to spread the cost of irrigation, and can reduce concerns regarding growth inducing nature of extending potentially potable water supply lines into agricultural areas. In addition, if irrigated agriculture is the goal, new surface water supplies are likely to be too expensive for agricultural customers.

Page 2-9: The report states:

“As with other areas within the county, groundwater is unreliable in terms of quantity and quality.”

This theme of the unreliability of groundwater quantity and quality is repeated throughout Chapter 2. There is more to be said on this subject. First, groundwater availability varies greatly by geographic region of the county; and varies greatly within those regions on a parcel-by-parcel basis. Second, the county is active in addressing this concern. Until the General Plan Update is approved, the County is operating under an interim development policy that restricts subdivision of parcels below 40 acres when not served by public water and sewer. Should this policy become incorporated into the General Plan, it will reduce the threat of rural sprawl on future groundwater reliability. Third, groundwater wells will remain a source of water supply well into the future. Many existing residents are served by wells and want to stay on wells. Many independent spirits will strongly resist well monitoring, well metering, and paying CCWD for water service or groundwater recharge. This factors need to be considered when planning for groundwater management. In the final plan, please explain how CCWD intends to deal with this challenge to providing water service, and to developing conjunctive use projects in the west county.

Page 2-9: The report states:

“As a result of its rural nature and low median household income, the District seeks

every state and federal grant opportunity to fund infrastructure replacement and maintain and improve water quality for the Community of West Point/Wilseyville.”

Thank you for your efforts.

C) Chapter 3:

Page 3-1: The report states:

“The County is undergoing a demographic and economic change that is leading to the fastest growth rates ever experienced in the County.”

This sentence is no longer true and should be deleted from the report. While population growth has occurred steadily in Calaveras County over the last three decades, the data we have seen reflect a decline in growth rates over time. The mean average annual growth rates for the last three decades are as follows: 4.4% 1980-1990; 2.4% 1990-2000; and 1.45% 2000-2009. (Calaveras County, General Plan Update Alternatives Report, February 2010, p. 8; Calaveras County, Public Review Draft General Plan Baseline Report; p. 2-1.) In addition, the fastest growth rates in the county occurred in the 19th century, during the Gold Rush. Modern growth rates are minimal by comparison.

Page 3- 1: The report states:

“This section presents the historical and projected population for each of the District’s water service areas. Population projections presented in Table 3-1 are based on a combination of the Calaveras County General Plan, District master plans for each area, capita per connection analysis, and projected growth rates obtained from the California Department of Finance (DOF).”

The countywide growth projections in Table 3-1 are consistent with DOF estimates and with County General Plan estimates. In that respect, these numbers are defensible.

However, as discussed earlier, these numbers do not account for service and infrastructure limitations that may reduce the rate of growth. In addition to the limited road funding example provided earlier, there are other necessary urban services that have no fiscal mechanism to expand with population. For example, the County has no set mitigation fee for the impacts of growth on law enforcement, despite a nexus study demonstrating the need for such a fee. (See, Calaveras County Sheriff’s Department, Staffing Analysis and Strategic Plan, 2007.) Lack of impact mitigation in the future may result in the denial of development projects, or a decline in the attractiveness of the area.

CCWD is correct that its ability to defend and maintain water rights will depend upon its ability to substantiate claims of future need. If CCWD wants the County to meet its future growth estimates, CCWD should encourage the County to mitigate the impacts of future development that could otherwise prove an impediment to growth.

Similarly, the ability of CCWD to secure future water allocations will depend on the ability of CCWD to demonstrate that the use of the water will promote the public interest. (Water Code, sec. 1253.) Such a demonstration often includes a showing that the impacts of new development served by the water will be fully mitigated. Other water competitors are preparing for these demonstrations by reducing the impacts of future development. In San Joaquin County, one jurisdiction has adopted an agricultural land mitigation program. Also, they have adopted a multispecies habitat conservation plan. Again, if CCWD wants to be able to compete well before the State Water Board, it should encourage Calaveras County to keep up with the competition in mitigating the impacts of new development.

The service area growth estimate for the Jenny Lind service area does not parallel that of the County. While CCWD anticipates an additional nearly 6,000 people in the Jenny Lind service area by 2035, the County estimates only an additional 2000-3000. (Calaveras County, General Plan Update Alternatives Report, February 2010, pp. 56.) Please correct this in the final report.

As noted earlier, in water planning there is harm associated with overestimating the rate of increase in demand. The CPC encourages CCWD to have contingencies planned to maintain permitted water in the event that growth does not proceed at the pace CCWD anticipates. We think that expanding the scope of beneficial uses (e.g. fish, recreation, etc.) to which CCWD water is put will help in this effort.

Page 3- 3: The report states:

“Based on these discussions, irrigated agriculture using raw water is projected to increase in the Camanche/Valley Springs area and is contained within the water demand projections for the area beginning in 2015. Until more is known about number of agricultural customers, the District represents irrigated agricultural raw water demand as one connection. The other raw water user in the Jenny Lind service area is the La Contenta golf course that diverts water directly from the New Hogan Reservoir to supplement its recycled water irrigation supply.”

Page 3-4: The report states:

“The District also anticipates new agricultural connections representing nearly 10,000 acres of agriculture based on current discussions with the agricultural experts and growers interested in developing irrigated agriculture in Calaveras County.”

Also, on page 3-16 the report states:

“The proposed agriculture raw water demands of 8,000 acre-feet are expected to begin in 2015 and increase through 2050.”

Also, on page 3-17 the report states:

“The proposed agriculture demands of 4,000 acre-feet are expected to begin in 2015 and increase through 2050.”

Also, on page 3-19, the table estimates 2,000 acre feet per year of raw water for agriculture in the West Point Area.

Please provide some source documentation for these estimates. Who are these agricultural experts and growers? What crops are they expecting to grow? Do these crops grow in the soil types, soil depths, and climate conditions near the Copper Cove, Valley Springs, and West Point sub-regions? How many acre feet of water do these crops require per acre per year? Do the crops create sufficient value to absorb the substantial cost of that much water? Consider including in the final version of the UWMP the map and data from pages 139 and 145 of the draft LAFCO report.

Without this data, do you really expect anybody to believe that irrigated agriculture is going to increase that much? Very few Sierra foothill counties have been successful in maintaining an increase in their net acres of irrigated agriculture. Generally, the benefits of intermittent success have been swallowed up by subsequent losses.

Net Change in Irrigated Acres from 1998-2006

County	1998-00	2000-02	2002-04	2004-06	Total
Mariposa	+14	-43	-49	-85	-63
Amador	+497	+56	+9	-512	+50
Placer	+1157	-1383	-240	-1692	-2158
Nevada	-19	+1125	+892	-360	+1638

(Source: California Department of Conservation, California Farmland Conversion Report, 1998-2000, 2000-2002, 2002-2004, 2004-2006.)

We at the CPC understand the desire of CCWD to demonstrate that there is a future demand for all of its existing permitted and contracted water. We understand that CCWD would like to present that demand as coming from the residential and irrigation sectors, since those are the highest ranking beneficial uses. (Water Code, sec. 1254.) However, it is essential to provide some defensible factual basis for the data in the report. Please provide this data in the final report.

As noted before, we at the CPC support sustainably enhancing the economic viability of agriculture in Calaveras County. At the CPC, we also hope that CCWD will put water to a broader variety of beneficial uses in a prompt and cost effective manner. For example, the mere diversion of water to existing hydroelectric storage facilities, with its later precise timed release for fish, wildlife, or commercial recreational benefits, can demonstrate a valuable beneficial use. This sort of prompt and cost effective means of

establishing a beneficial use may prove critical to maintaining CCWD's water permits pending the actual growth in agricultural demand, and the actual construction of infrastructure to deliver it. When it comes to putting its currently surplus water to a beneficial use in the future, we encourage CCWD not to put so much pressure on irrigated agriculture to pick up so much of the slack.

Page 3-16: Table 3-19 estimates large amounts of water going to groundwater recharge and irrigated agriculture.

First, it seems the UWMP estimate for groundwater recharge is higher than that on page 145 of the draft LAFCO report. Please work with LAFCO to resolve these differences in the final reports.

Second, there is a huge risk in placing so much reliance on irrigated agriculture and groundwater recharge/conjunctive use to demonstrate future water demand. It makes your water permits and applications vulnerable. It makes CCWD's grip on its water rights dependent on huge speculative investments and concessions by others, some with conflicting interests. If those demand targets are not realized, other water interests may seek to appropriate what CCWD has not put to any beneficial use. We encourage CCWD to diversify its beneficial uses of water, and to aggressively pursue conservation and reclamation, to better secure its water supplies against outside interests.

D) Chapter 4

Page 4-5: The report states:

“The same SWRCB WR No. 97-05 decision authorizes a 6,000 acre-foot diversion from Lake Tulloch to meet the water supply needs of the Copper Cove/Copperopolis area under CCWD's North Fork Stanislaus River permits. This condition was established to match growth and water supply demand projections; accordingly, when demand approaches this supply, the District will request a change of condition of its existing rights to allow higher diversions.”

The fact that CCWD may need to go to the Water Board to seek additional supply for the Copper Cove area in the near future makes it very important for CCWD to get a handle on the increase in acre feet per ESFU in the Copper Cove service area. As noted previously, water use in the Copper Cove Area has increased from 0.34 AFA (acre-feet per annum) demand per ESFU to 0.56 AFA/ESFU. CCWD expects this trend to continue, and uses 0.70 AFA/ESFU for planning purposes. Much of the increase is due to water-intensive urban landscaping. (CCWD, Water Supply Assessment Tuscan Hills Project/Copper Cove Service Area, 2005, pp. 6.) This affluent and hot area of the county seems to be primed for a program to promote drip irrigation, lawn replacement, and xeriscape techniques. With County cooperation, such techniques could even be incorporated into the design standards section of the proposed community plan. Please consider putting these actions in your final plan. When you go to the State Board for

more water, you want to be able to show that you have done all you can to efficiently use and reuse the current water allocation.

Page 4-5: The report states:

“Potential impacts to the water supply quality include increased sediments from runoff, nutrient loading, and coliform bacteria. These impacts, however, do not affect supply reliability as they can be mitigated through watershed programs, treatment technology, and supply management.”

While treatment can resolve water quality problems for potable supplies, it may not be applied to raw water supplies. Would the presence of coliform bacteria affect the ability of CCWD to deliver raw water for crop irrigation or limit the crops that may be grown with it? Would this affect the expected raw water demand reported in this UWMP?

Page 4-8: The report states:

“Potential impacts to the water supply quality include increased sediments from runoff, manganese from runoff and low reservoir levels, nutrient loading, and coliform bacteria. However, these impacts do not affect supply reliability as they can be mitigated through watershed programs, treatment technology, and supply management.”

While treatment can resolve water quality problems for potable supplies, it may not be applied to solve problems with raw water supplies. Would the presence of manganese, or coliform bacteria, or even nutrient loading make the raw water unattractive for use for some crop irrigation? Would this affect the expected raw water demand reported in this UWMP?

Page 4-14 includes Table 4-12 listing Water Supply Projects.

The UWMP provides very little detail on these proposed projects. It is frustrating that this report does not provide project yields and project costs so that they can be compared to comparable yields and costs for other options. It is disappointing that the report does not identify the priority of different projects. It is curious that the report mentions none of the controversy around IRCUP+ and its component parts: Pardee Reservoir Expansion and Duck Creek Reservoir; both of which have already resulted in court battles. The final plan should provide better disclosure of material facts to the ratepayers.

We at the CPC strongly discourage CCWD from relying on Pardee Expansion or Duck Creek Reservoir as a means of storing and diverting water under its Mokelumne River state filings. There are great barriers to successful implementation of these IRCUP+ components. The cooperation among the competing interests, tenuous at best during these project planning years, is likely to collapse entirely in when it comes to actually divvying up limited water supplies in dry years. It may prove better for CCWD to seek

assistance for water storage and release from existing hydroelectric projects that release water into the river during the hot summer months when CCWD will need it the most.

E) Chapter 5

As an introductory note, it appears that many table numbers in the text and on the tables do not match up. Many table numbers are repeated. Many table numbers are not sequential. (See Table 5-5 Forest Meadows...; Table 5-6 Arnold ...; Table 5-7 Arnold...; Table 5-8 Arnold...; Table 5-9 Douglas Flat...; Table 5-10 Douglas Flat...; Table 5-11 Other...) Please fix this in the final draft to make the document more user-friendly.

Page 5-2: The report states:

“Without these preferable alternatives, the District will dispose of additional effluent through dedicated land application. This non-recycled disposal is summarized in Table 5-3.”

The CPC notes that CCWD is not anticipating using any recycled water from La Contenta for wildlife habitat or wetlands. These qualify as beneficial uses of water. The use of recycled water for these purposes can be used to justify delays in meeting water permit deadlines. The use of water for these purposes also demonstrates a more diverse water use that reflects a broader public interest and a better effort at water conservation. We strongly encourage CCWD to work with the Department of Fish and Game, the Mother Lode Land Trust, and other involved in plant and wildlife conservation and impact mitigation. These entities may be able to help CCWD find a way to put surplus recycled water to a beneficial use.

Page 5-4: The report states:

“In particular, the District, in consultation with agricultural experts, are projecting 9,500 acres of new agricultural land in the region, equivalent to a 38,000 acre-fee per year demand by 2050. The demand is assumed to start in 2015 with 4,000 acre-feet and build to maximum demand in 2050.”

Please provide some source documentation for this estimate. Who are these agricultural experts? What crops are they expecting to grow that use 4-acre feet of water per acre? This is a very large amount. Do these crops grow in the soil types, soil depths, and climate conditions near the Copper Cove service area? Do the crops create sufficient value to absorb the substantial cost of that much water?

Without this data, do you really expect anybody to believe that raw water demand for irrigation will increase this rapidly? Very few Sierra foothill counties have been successful in maintaining an increase in their net acres of irrigated agriculture.

Generally, the benefits of intermittent success have been swallowed up by subsequent losses.

Net Change in Irrigated Acres from 1998-2006

County	1998-00	2000-02	2002-04	2004-06	Total
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Amador	+497	+56	+9	-512	+50
Placer	+1157	-1383	-240	-1692	-2158
Nevada	-19	+1125	+892	-360	+1638

(Source: California Department of Conservation, California Farmland Conversion Report, 1998-2000, 2000-2002, 2002-2004, 2004-2006.)

We at the CPC understand the desire of CCWD to demonstrate that there is a future demand for all of its existing permitted and contracted water. We understand that CCWD would like to present that demand as coming from the residential and irrigation sectors, since those are the highest ranking beneficial uses. However, it is essential to provide some defensible factual basis for the data in the report. Please provide this data in the final report.

As noted before, we at the CPC support sustainably enhancing the economic viability of agriculture in Calaveras County. At the CPC, we also hope that CCWD will put water to a broader variety of beneficial uses in a prompt and cost effective manner. For example, the mere diversion of water to existing hydroelectric storage facilities, with its later precise timed release for fish, wildlife, or commercial recreational benefits, can demonstrate a valuable beneficial use. This sort of prompt and cost effective means of establishing a beneficial use may prove critical to maintaining CCWD’s water permits pending the actual growth in agricultural demand, and the actual construction of infrastructure to deliver it. When it comes to putting its currently surplus water to a beneficial use in the future, we encourage CCWD not to put so much pressure on irrigated agriculture to pick up so much of the slack.

Page 5-5: The report states:

“As development continues and wastewater flows increase, the District plans to include seasonal surface water discharge in addition to the recycled water golf course irrigation.”

Table 5-12 (Labeled “Table 5-5”. Please correct.) estimates that the recycled water will be used for agriculture. The text above says it will be discharged to surface water. This is confusing. Will the water be discharged to a stream, or used for agriculture, or are both a possibility? Is there any way to get a beneficial use out of the additional recycled water? We realize that in this area most residents prefer to retain the incredibly beautiful naturally forested landscape, so there is less demand for landscape irrigation. Instead of random discharge to the stream, is there a way to enhance fish and wildlife habitat through specifically timed discharges? We hope CCWD is successful in finding a way to put the recycled water to a beneficial use.

F) Chapter 6

Pages 6-1 to 6-10: The report states:

“The exemption is based on cost effectiveness and lack of budget. The exemption report is included in Appendix F. CCWD has applied for grants in the past to support this program, but has not been successful.”

This excuse was repeatedly used to justify lackluster implementation of several demand management measures (survey programs, plumbing retrofit, Model Landscape Ordinance, high efficiency washing machine rebate, CII, ULFT, etc.)

The water savings from demand management provides four key benefits to future development. First, it helps to extend our water supplies and thereby reduces the impact of new development on water supplies. Second, it helps CCWD to justify delays in meeting water permit deadlines, and in securing deadline extensions from the State. Third, it helps CCWD defend its water rights against those who would otherwise claim its usage wasteful. Fourth, it provides “new” water at a substantially lower cost than expensive new infrastructure.

Because these demand management measures reduce the water supply impacts of new development, new development can be charged mitigation fees to help pay for the implementation of these measures. This is part of the concept of water neutral development: that new development provides funding for water savings that are then used by the new development. We encourage CCWD to work with Calaveras County to implement these sorts of measures to fund demand management efforts. We also hope that CCWD will do a better job of tracking its progress and its expenditures for these demand management efforts so that it can have a better basis for demonstrating program success and for seeking funding. In addition, CCWD could work with the county to develop a water-neutral requirement for future development proposals.

CCWD cannot afford to fall behind other jurisdictions in these efforts. If you do, those jurisdictions can use your failures to conserve to challenge CCWD’s water licenses, permits, and applications. (For protests of applications see: Water Code, secs. 1253, 1255, 1257, 1258, 1302-1304; see also protest forms on SWRCB website.)

Page 6-4: The report states:

“The state’s Model Landscape Ordinance promulgated in 2006 went into effect on January 1, 2010 requiring cities and counties to enact its own landscape ordinance per the state’s minimum standards or adopt the state’s model landscape ordinance. The requirement is for new development to install low water landscaping plans for qualifying new residential construction, mandate efficient irrigation systems, and require the developer to file sworn statements that the systems have been installed according to approved plans. CCWD is working with County planning staff on the County’s General Plan Update, which may consider a landscape ordinance.”

We hope you are successful in getting the County to adopt this ordinance as soon as possible, so that it will be in place for implementation when building resumes.

G) Chapter 7

Page 7-1: The report states:

“With accelerated growth trends prior to the recent economic downturn and supply pressures from potential agricultural users and other stakeholders, this analysis receives an elevated scrutiny from multiple stakeholders. In response, the District is incorporating multi-stakeholder efforts and looking regionally to strengthen its supply portfolio.”

As stated previously, we hope that CCWD welcomes the meaningful participation of stakeholders. We at the CPC welcome the opportunity to meet with CCWD staff to discuss and resolve the issues we have raised in these comments prior to the approval of the Urban Water Management Plan 2010 by the CCWD Board in June. This would give us the opportunity to provide more supportive comments when you submit your plan to DWR.

Table 7-1

Tables 7-1 through 7-4 indicate that potable demand will remain a very small percentage of the total available permit and contract supply through 2050. The vast majority of the remainder of the water will be used in raw form.

We at the CPC understand the desire of CCWD to demonstrate that there is a future demand for all of its existing permitted and contracted water. We understand that CCWD would like to present that demand as coming from the residential and irrigation sectors, since those are the highest ranking beneficial uses. However, it is essential to provide some defensible factual basis for the data in this table. Please provide this data in the final report.

In Copperopolis, raw water demand for irrigation is estimated to increase by seven times in the next 35 years. Do you really expect anybody to believe that raw water demand for

irrigation will increase this rapidly? Very few Sierra foothill counties have been successful in maintaining an increase in their net acres of irrigated agriculture. Generally, the benefits of intermittent success have been swallowed up by subsequent losses.

Net Change in Irrigated Acres from 1998-2006

County	1998-00	2000-02	2002-04	2004-06	Total
Mariposa	+14	-43	-49	-85	-63
Amador	+497	+56	+9	-512	+50
Placer	+1157	-1383	-240	-1692	-2158
Nevada	-19	+1125	+892	-360	+1638

(Source: California Department of Conservation, California Farmland Conversion Report, 1998-2000, 2000-2002, 2002-2004, 2004-2006.)

In some areas (Valley Springs and Copperopolis), the proportion of recycled water use to potable water use is dropping? Why would the proportion of recycled water used drop so much, when the emphasis is to increase the use of recycled water?

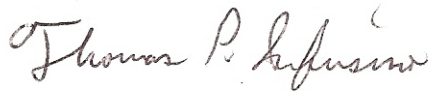
As noted before, we at the CPC support sustainably enhancing the economic viability of agriculture in Calaveras County. At the CPC, we also hope that CCWD will put water to a broader variety of beneficial uses in a prompt and cost effective manner. For example, the mere diversion of water to existing hydroelectric storage facilities, with its later precise timed release for fish, wildlife, or commercial recreational benefits, can demonstrate a valuable beneficial use. This sort of prompt and cost effective means of establishing a beneficial use may prove critical to maintaining CCWD’s water permits pending the actual growth in agricultural demand, and the actual construction of infrastructure to deliver it. When it comes to putting its currently surplus water to a beneficial use in the future, we encourage CCWD not to put so much pressure on irrigated agriculture to pick up so much of the slack.

III. Conclusion

In conclusion, we at the CPC would like to thank you for the opportunity to comment on the Draft Urban Water Management Plan 2010. We have offered these comments with the hope that the CPC and CCWD can work together on those water management efforts that will serve a broad spectrum of beneficial uses that enhance our local economy, ecology, and communities.

We welcome the opportunity to meet with you and other CCWD staff to discuss and resolve the issues we have raised in these comments prior to the approval of the plan by the CCWD Board. This would give us the opportunity to provide more supportive comments when you submit your plan to DWR.

Sincerely,

A handwritten signature in cursive script that reads "Thomas P. Infusino".

Thomas P. Infusino, Facilitator
Calaveras Planning Coalition

Attachment 1: CCWD Draft 2010 UWMP Questions and Answers

Ed,

In a recent article for the CAP newsletter, we encouraged people to review the UWMP against a series of relevant questions. Below I have provided an assessment of the CCWD 2010 Draft UWMP using those questions. As you can see, while the Draft UWMP does a good job of addressing many issues, it still leaves a lot of important questions un-answered.

Perhaps these questions can be better answered using other existing information at CCWD. If so, perhaps these other document could be included in the appendices for the UWMP, and put on the CCWD website for public review.

Thanks,

Tom Infusino

A) Does the UWMP include the basic required parts?

An UWMP must identify the expected growth within the district's service area in five year increments. (Are the growth projections defensible if challenged by a water competitor?) **YES**

An UWMP must identify the water supply needed to service that growth in five year increments. **YES**

(Are the needed water supply projects scheduled to be completed in time? Are the existing water supplies secure? Are the new water supplies realistic?) **Can't Tell**

An UWMP must describe the reliability of each water source in normal, dry, and multiple dry years; and identify contingency plans for any water shortages that may result. **Yes**

(Can we make our local water supplies less vulnerable to shortages? Can we make our homes and businesses more resilient to water shortages?) **Can't Tell**

An UWMP must identify past and current water use in five year increments for each water use sector (i.e. industrial, commercial, agricultural, etc.). (Are there any trends in water use that the plan should address?) **Data Not Available**

An UWMP must look at water quality issues and how they affect water supply.
YES

(Are there steps that we can take to manage our watershed better to avoid water quality problems?) **Can't Tell**

B) Will we be conserving water resources under the plan?

An UWMP must also evaluate the cost effectiveness of additional demand management measures relative to other sources of water supply. Un UWMP must evaluate the opportunities for additional water recycling. Does the plan include sufficient components of water conservation, water reclamation, and groundwater recharge with a reasonable schedule for their implementation? Will these efforts be monitored and their success recorded so that we get credit for the water savings with the state? **Can't Tell**

C) Does the water plan collaborate responsibly with those willing?

When looking at such proposals in the water plan, we ask ourselves: Will these collaborative agreements provide the opportunity both to partner with trustworthy agencies, and also to verify and enforce compliance with the agreements? What are the consequences if collaboration fails? Do we have a reliable backup if collaboration fails? Are we participating in open forums that will result in implementable collaborative efforts, or are we closing the doors and creating enemies? **Can't Tell**

D) Is the plan cost conscious?

1) Can we afford the price tag? **Can't Tell**

2) Are expenditures prioritized? **Can't Tell**

3) Will the beneficiaries pay? **Can't Tell**

4) Will the plan help us to recapture our taxes? It is always worth asking, does the Urban Water Management Plan prepare us to tap state and federal funding programs, so that we can get our tax money back to work for us in Calaveras County? **Yes**

5) Will the plan result in rates that are equitable? Will the plan allow for baseline usage at low rates for those on fixed incomes or with low incomes? **Yes**

E) Is the plan consistent with other local values?

Does the water plan recognize the wishes of some folks who want no part of water from the water agency? **Can't Tell**

Does the plan include ways to encourage and instruct “do it yourselfers” who are willing to take their own efforts to install drip irrigation, water saving fixtures and appliances, capture rainwater, re-using grey water, etc.? **YES**

Will the plan enhance or detract from the value of people’s real property? **Yes**

Will the water plan protect waters for multiple uses including: fishing, mining, wading, swimming, boating, kayaking, rafting, and tubing? **Can't Tell**

F) Does the water plan support the County General Plan or interfere with its objectives?

Since the General Plan is trying to encourage economic and residential development in and near existing community centers, does the Urban Water Management Plan focus on providing infrastructure to these areas? **Yes**

Since the General Plan seeks to retain and enhance productive agricultural lands, does the Urban Water Management Plan provide water to support agriculture? **Yes**

Does it reduce residential dependence on groundwater needed by agricultural operations?

Yes

G) Does the plan facilitate water right retention and acquisition?

In making water rights and water development decisions regarding Calaveras County, the State Water Board will look at the local need for water, the efficiency of delivery, the lack of waste, the diversity of beneficial uses (including fish and wildlife), the County’s success in treating wastewater and returning clean water to the hydrologic system, and the degree to which the County will meet its water needs through conservation and reclamation/re-use. Other cities, counties, and utilities seeking to protect their water interests may protest Calaveras County’s water rights applications. These opponents will exploit any weakness Calaveras County may have in these areas to convince the State Water Board to deny or to strictly limit the water right. Are the county and the district keeping up with their competition when it comes to each of the items that the State Board will scrutinize? **Some Yes, Some No**

