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June 7, 2011

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

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

Dear Directors,

My name is Tom Infusino, and I am providing these further comments on the 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.

On Friday, June 3, I had the privilege of meeting with your fine staff to discuss the concerns noted in the CPC letter of May 24, 2011. We condensed that 22-pages of comments into four pages of questions, and addressed each question one at a time.

I. We found common ground on a number of issues.

I am pleased to report that CCWD staff and the CPC appear to have a great deal in common on many water issues.

We agree that we should identify those areas of agreement on which we can collaborate in the future.

We agree that water should be allocated to the full spectrum of beneficial uses.

We discovered that CCWD staff is willing to provide input regarding possible improvements to the draft water element as the General Plan Update proceeds.

We both appreciate that in-stream flow requirements and 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.

In addition to its more prominent water supply efforts, CCWD is open to looking at other options, including developing water for recreational and environmental beneficial uses, by

negotiating storage and release agreements with existing hydroelectric storage facilities, to provide CCWD with a cost-effective and expedient method of putting currently “unused” water under to a beneficial use.

CCWD is willing to participate in conflict resolution mechanisms and planning efforts with the broader spectrum of stakeholders inherent in our regional water management (e.g. ratepayers, other service providers, cities, counties, recreation and tourism businesses, riparian landowners, conservation groups, fishermen, etc.). We hope to see evidence of this in CCWD’s future planning efforts including preparation of the Business Plan, the Master Plan update, and the MAC IRWMP update. We will not be able to convince skeptical parties of the value of these efforts if they are not in the room and at the table.

We both continue to promote the concepts of low impact development for watershed protection.

We both see value in groundwater recharge.

We both recognize the potential limitations to growth that may result from the inability of other providers of public service (roads, schools, law enforcement, fire and emergency services, etc.) to serve the same level of development as CCWD.

We are both willing to work with local volunteers, organizations, and businesses on educational efforts to reduce landscape irrigation demand, especially in the Copper Cove area of the County, by promoting drip irrigation, lawn replacement, and xeriscape techniques.

CCWD is committed to tracking its progress regarding demand management efforts so that it can demonstrate meeting its target for compliance with “20% by 2020”.

II. The CPC continues to have a number of concerns and recommendations regarding water supply and demand management in general, and the UWMP in particular.

The CPC remains concerned that the vast majority of future water demand is based upon an agricultural water demand study that is not complete, not yet approved by the CCWD Board, not available for public review, does not consider the cost of water as a factor affecting the needed supply, and does not ensure that the value of the crops produced will be sufficient to absorb the cost of the irrigation water. This is contrary to the notion that the UWMP must be supported by substantial evidence in the record. (Water Code, sec. 10656.) **We urge the CCWD Board to review and approve this agricultural water demand report, and make it available to the public, prior to turning the UWMP in to DWR by July 30.**

Given the heated controversy regarding the Pardee Expansion and the Duck Creek Reservoir, we strongly encourage CCWD not to rely on the success of these projects as a means to secure water rights, water storage, or water distribution. In fact, we encourage CCWD not to directly or indirectly endorse these controversial projects.

We encourage CCWD to abandon the notion that the quality of future development in Calaveras County is solely the domain of the Board of Supervisors, and has no effect on

CCWD. Your costs and ability to serve future development will be a function of the efficiency of future land uses. Your ability to secure future water allocations from the State can be limited by the degree to which future development in Calaveras County protects the environment and promotes the public interest. (Water Code, secs. 1253, 1255, 1257, 1257.5, 1258.) The more that a general plan fails to mitigate its adverse social and environmental impacts, the more difficult it will be for CCWD to secure the water to facilitate that growth. By way of contrast, neighboring jurisdictions competing for water are completing multi-species HCPs, implementing agricultural land mitigation programs, and employing other methods to reduce the harm of urbanization. We encourage CCWD to warn Calaveras County that in the competitive arena of water rights, Calaveras takes a great risk when it falls behind other thirsty county's efforts to promote the public interest.

In future planning efforts, including the Business Plan, the Master Plan Update, the MAC IRWMP Update, and amendments to the UWMP, we encourage CCWD to provide more detail regarding future water supply projects, their anticipated yields, the timing for their completion, their costs, their funding sources, their effect on rates and hook-up charges, and their potential environmental harm.

In future planning efforts, we encourage CCWD to identify its backup plans to provide water for other beneficial uses (including fish, wildlife, and recreation) in the event that residential and agricultural demand does not increase at the rate anticipated.

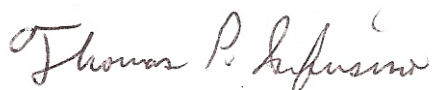
In future planning efforts, we encourage CCWD to identify sufficient conservation, reclamation, and conjunctive use projects to help extend your water permit deadlines, in the event that other new supply projects are not completed in a timely fashion.

III. Conclusion

In conclusion, we at the CPC would like to thank you again for the opportunity to comment on the 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 look forward to continuing to work with your staff on those issues where we have common interests.

Sincerely,



Thomas P. Infusino, Facilitator
Calaveras Planning Coalition

cc. Joone Lopez, Bob Dean