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May 21, 2021

Brad Arnold Water Resources Manager Calaveras County Water District (Sent by email)

RE: 2021 UWMP Update

Dear Mr. Arnold:

I am writing to you on behalf of the Calaveras Planning Coalition (CPC) regarding the 2021 Urban Water Management Plan (UWMP) update for the Calaveras County Water District (CCWD).

The CPC 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.

The CPC has a history of involvement with CCWD. In 2008 and 2009 we worked with CCWD and a stakeholders group to draft a Water Element for the Calaveras County General Plan. In 2011 we commented on CCWD's Urban Water Management Plan. From 2012-2013 we worked with CCWD and other stakeholders in drafting the MAC Integrated Regional Water Management Plan. From 2013 to 2015 we worked with CCWD and other stakeholders in the MokeWise collaborative process. In 2018 we joined CCWD and others in support of Wild and Scenic Designation for segments of the Mokelumne River.

We at the CPC recognize and appreciate the effort and time CCWD has put into the April 2021 public draft of the UWMP update. The depth of information and the productive dialogue were both refreshing. The CPC is grateful that CCWD incorporated some consideration of the impacts of climate change on water demand in relation to residential water use. We appreciate the comprehensiveness of the Water Shortage Contingency Plan as well.

As the drought continues, it is critically important that we accurately assess our supply and demand for water, currently and into the future. While nothing is guaranteed, there are many modeling tools and other resources that support increasingly accurate and realistic predictions for future water demands.

Many experts like climatologist Bill Patzert believe "We've really been in a drought since 2000, with some wet years (2005, 2010, 2011 and 2017) in Central California." Patzert was also quoted as saying, "The wax and wane of wet years have given many a false sense of security; however, California has entered 'a new normal' of significantly more dry years resulting in lower lake levels, less groundwater, depleted aquifers and skimpier Sierra Nevada snowpack."¹

After reviewing the proposed UWMP, the CPC has chosen to raise four main concerns. We sincerely hope you will consider our feedback and we appreciate you taking the time to address our concerns.

Protecting existing rate-payers by requiring developers to foot the bill

The District has a very broad program, servicing "six different water supply service areas within the County from four different water sources." The CPC understands the many challenges CCWD faces: balancing water rights; forecasting and preparing for drought conditions; predicting population fluctuations and supply and demand changes; lack of funding for many capital improvements; the dependency on grants from local, state, and federal resources; and an aging delivery system.

This balancing game creates conflict, particularly if there is a belief in a never ending water supply for CCWD. There is a difference between water rights and the water that is deliverable in a dry year. This is especially true of Bureau of Reclamation contracts and state water rights. They provide very little water in dry years due to over commitment of water. There is far more water promised "on paper" to stakeholders than there is in California's waterways.

The CPC also agrees with the County General Plan that existing ratepayers should come first, ahead of new connections and other infrastructure to support new development. The 2019 Calaveras County General Plan update also supports the need to ensure that new developers pay the costs associated with providing services, such as water, to their developments. We would like to see the UWMP better aligned with this principle.

We would like CCWD to make the following changes for the benefit of their ratepayers:

1. Set clear and specific deadlines for policy development,

¹ Lindsey, John, Drought-like conditions in California are the new normal, Santa Ynez Valley News, May 9, 2021;

https://syvnews.com/news/local/lindsey-drought-like-conditions-in-california-are-the-new-normal/article_cc 20b809-1598-5e5e-ae42-80d5d0549043.html#1.

- a. Specifically, please prioritize completion of the programmatic response to assess risks and vulnerabilities of drought conditions and its impact on water supplies.
- 2. Assign clear and specific financial liabilities for policy and program development.
- 3. Develop a new water permit system when CCWD emergency drought provisions reach stages 5 and 6.
 - a. Alternatively, CCWD could institute a tiered permit release program.

Protect the Community of Wallace and Subregion (D)

Your partnership with the Eastside Groundwater Sustainability Authority (GSA) and in turn the Eastern San Joaquin Groundwater Authority, developed a "Groundwater Sustainability Plan (GSP) published in 2020." This is "aimed at bringing the critically overdrafted Subbasin into sustainable conditions by 2040 per the Sustainable Groundwater Management Act (SGMA)."

CCWD describes the Wallace subregion as producing 61AFY consistently from 2020-2045. Drought conditions in this critically overdrafted subbasin are highly likely to affect the ability to pull 61AFY. Other groundwater users in the area will also very likely continue to contribute to the depletion of this source. Residents in this part of the county have failing wells and have to haul water because they're located on an overdrafted groundwater basin. Surface water alternatives are extremely limited in the area. There were years of drought (1977, 1988, 1991-92, 2015), when rain and surface water runoff stored in Hogan Reservoir was dangerously low. There were times Hogan was down to 10,000-15,000 AF out of 300,000 AF. They call this "dead pool" storage, with what little water is left having terrible quality, offering little promise of help as an alternate surface water source for Wallace.

We would like CCWD to make the following changes for the benefit of the communities of Wallace:

- 1. Provide an assessment of groundwater production in this subregion that considers the overall decline of groundwater in this basin, and provide documentation illustrating how all groundwater production estimates for this subregion were calculated.
- 2. Do not issue any new connections or permits supporting new development in the Wallace subregion until alternatives to groundwater are guaranteed.

Repair failing infrastructure before allowing more development in Copperopolis

Copperopolis is both the area with the highest amount of system loss, and the highest potential for growth. Predicted increases in land development into the 2000's fell short in part due to the

2007/2008 housing market collapse. In contrast, a 2020 state analysis predicts a shrinking Calaveras County population with limited growth. Predicting the future of development is not a perfect science, but it does rely upon valid data and modeling. However, identifying which water systems are suffering the most losses and have the most infrastructure in need of repair *is* a more precise science.

In 2020 a CCWD AWWA water loss analysis exposed an 8.9% water loss in the Copper Cove/Copperopolis system. This equates to an annual loss of \$224,959 and an annual loss of 141.34 MG/Yr of water. The Copperopolis system has the highest water loss (by almost double) in the District's six service areas. The need for CCWD to invest in improving efficiency of the Copperopolis system is clear.

It is imperative that CCWD prioritize these competing interests appropriately by ensuring a safe and reliable water supply to the Copperopolis area before investing existing ratepayer money in supporting future development.

These competing interests are illustrated by CCWD's current five year CIP. CCWD's five year Capital Improvement Plan (CIP) has given phase I (2019-2023) priority to the Saddle Creek transmission main. This project is a \$8,142,000, 2 mile, 20" pipeline water main. Phase II and Phase III deal with repairing, replacing, and upgrading existing water and sewer infrastructure. These CIP phases need to be flipped to accommodate existing infrastructure repair first.

We believe the revised Copperopolis CIP should include the following:

- 1. Copper Cove/Copperopolis system replacement of the Kiva Dr sewer force main and pump stations;
- 2. C4 backup main for improved hydrant flow operation;
- 3. B4 loop main replacement of an underwater lake crossing pipeline;
- 4. WTP clear well improvements;
- 5. B water tanks 1&2 replacement; and
- 6. a continued annual pipeline rehabilitation, replacement, and repair program.

While CCWD is confident in their ability to provide water, their access to water is still subject to disruption. Lake Tulloch, operated by TriDam, had drawdowns during the drought year of 2015. This caused the District to extend their Lake Tulloch intake siphons because of water supply

demands by TriDam owners South San Joaquin Irrigation District (SSJID) and Oakdale Irrigation District (OID). CCWD should acknowledge the potential for difficulties delivering water to the Copperopolis area in drought years like that of 2015 due to circumstances beyond their control.

We would like CCWD to make the following changes for the benefit of the community of Copperopolis:

- 1. Budget accordingly and continue grant requests to repair the failing systems in Copperopolis.
- 2. Reprioritize their 5 year CIP by placing existing pipeline improvements ahead of new utility installation.
- 3. Address the potential sale of 97 acres of surplus lands in Copperopolis and explain why those lands are not being designated for watershed benefits.
- 4. Provide clear and specific details justifying the incredible increase in predicted agricultural water demands for the Copperopolis community.

Filling State Water Rights from the Mokelumne

During the May 19, 2021 Calaveras-Amador-Mokelumne River Association (CAMRA) meeting, CCWD Director Michael Minkler disclosed that CCWD intends to look into filing for their 27,000 AF of State Reservation from the Mokelumne River over the next 6 months to 1 year. This information is very pertinent to the UWMP and should be included in the UWMP update.

We request that CCWD provide any details they can regarding this filing.

This includes the following specific details:

- 1. timing, place and means of diversion from the river;
- 2. timing, place and means of storage;
- 3. timing, place and means of diversion out of storage;
- 4. place and means of conveyance;
- 5. location where the water will be put to beneficial use;

- 6. kinds of beneficial uses to which it will be put;
- 7. costs of the project;
- 8. anticipated revenues from the project; and
- 9. the burden on the ratepayers.

We also ask that CCWD hold a workshop on the project BEFORE making the filing with the state. The best way to ensure that we are all pulling together on a project is if we plan it together.

Additionally, we request CCWD provide answers to the following questions:

- 1. Does the operation plan for the project square with the water availability modeling done for MokeWise?
- 2. If this is a reservoir reoperation project, or another MokeWise project, why not plan it together with all the stakeholders as we committed to in MokeWise?
- 3. If this water is being shipped to San Joaquin or Cosumnes groundwater basins to help them manage their groundwater, then how is the water being used in and for Calaveras County, as is the intent of the State Reservation?
- 4. Will San Joaquin be building a reservoir to store the water for later use? If so, where?
- 5. Is this a groundwater bank? If so, what facility will CCWD be using to get the water back uphill? Just 4 years ago CCWD told us they did not even want to pump water out of the Mokelumne upstream or out of Pardee, let alone uphill from the valley? Has something changed to make it feasible to pump water uphill now?

Again, we would like to commend CCWD for the hard work that went into this extensive plan, and thank them for considering our comments. We look forward to your response and to the final plan.

Sincerely,

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Megan Fiske, Outreach Coordinator Calaveras Planning Coalition