Mokelumne/Amador/Calaveras Integrated Regional Water Management Plan Update

VOLUME 3

Prepared by:

RMC
Water and Environment

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Appendix G– Public and RPC Comments and Responses

Public and RPC Member Comments on Draft MAC Plan Update Sections

Comments on draft Sections 1 through 4 of the MAC Plan Update were requested by October 3, 2012.
Comments on the Draft MAC Plan Update were requested by January 7, 2013.
Comments on the Draft CARWSP Report were requested by January 17, 2013.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
Public Comments					
1	Colleen Platt, MyValleySprings.com	10/5/2012	Section 4 - Implementing Projects and Programs	Incorrect Capital Costs in Chapter 4. Implementing Projects and Programs, in the spreadsheets in Appendix A and Appendix B for Project #23 New Hogan Reservoir Pumping Project. Undoubtedly these are typos, but there is a significant difference between $22,000 and $22,000,000. According to the Project Information sheets, the correct project Capital Cost is $22,000,000, not $22,000.	The cost will be corrected.
2	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	We have concerns about Calaveras County Water District's (CCWD) Project #23 (New Hogan Reservoir Pumping Project) and #24 (New Hogan Phase II Water Distribution Loop Project). From what we learned at the Sept. 24 MAC Plan Update Community Workshop, the Project Information Sheets from January, 2012 are still current and there have been no revisions or updates to CCWD project descriptions to-date. Our comments and questions are based on those January project descriptions.	The first round of project solicitation concluded on January 20th. The 2nd ended on May 30th. Additional information was provided for the projects submitted prior to January 20th. The updated forms are available on the UMRWA website under MAC documents.
3	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	In general, we feel Project #23 and Project #24 have not been adequately vetted. There has not been a thorough examination or evaluation of the projects by other agencies, local stakeholders, or the public. The project descriptions contain conflicting goals and statements with vague, sweeping, contradictory, and unsubstantiated claims. Both projects are intended to interconnect to each other and to the Camanche Regional Water Treatment Project (referred to as "Phase I"), but there is not enough information and clarity in the project descriptions to determine "technical feasibility." Previously-submitted public comments with criticisms and questions have not been addressed. Following are our comments and questions about the two Project Information Sheets and project descriptions that we feel should be addressed before accepting and moving these projects forward.	Part of the vetting process included a meeting between Muriel Zeller, CCWD, the Foothill Conservancy, and Tom Infusino on August 23, 2012 to discuss Muriel Zeller's comments on Projects 23 and 24. The project team will review these additional comments with CCWD and scores will be revised, as appropriate.

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4	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	"Promote water conservation", "Use and Reuse Water More Efficiently", "Agriculture Water Use Efficiency", and "Urban Water Use Efficiency" are all goals, priorities, and RMS strategies that CCWD claimed in order for the project to be eligible for IRWMP consideration. But how will water be conserved and used more efficiently when the New Hogan Pumping Project water delivery method is "gravity flow water conveyance" in "natural ephemeral streams that meander through the west county area"? Miles of open, meandering, overland water conveyance will lead to high water loss due to high evaporation rates and extensive leakage through open streambed channels.	The project team will review these additional comments with CCWD and scores will be revised, as appropriate.
5	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	"Maintain and Improve Water Quality" is a MAC Plan goal that was not claimed, and we understand why. Overland delivery of water across the west county through open streambeds would likely increase, not decrease, instream erosion and sedimentation, which is a concern for downstream water quality. Even if some measures are taken to prevent erosion (in the project description, "Portions of the streams may require lining to prevent scouring"), erosion and sedimentation will occur in streambeds.	Noted
6	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	"Portions of the streams may require lining" is not a habitat-friendly mitigation. Damage to riparian streambed habitat by lining creek beds would occur, diminishing project claims for creating and restoring habitat (listed under "Resource Stewardship Benefits"). Lining streams would also prevent percolation into the streambed and into any aquifers below.	The project team will review these additional comments with CCWD and scores will be revised, as appropriate.

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7	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	"Conjunctive Management & Groundwater Storage" and "Groundwater/ Aquifer Remediation" are project Resource Management Strategy claims, and "This project proposes to mitigate overdraft conditions associated within the 30,000 acre portion of the Eastern San Joaquin Groundwater Basin underlying western Calaveras County" and "will stabilize groundwater elevations" are Resource Stewardship Benefit claims, but the claims for benefits to groundwater appear to be without scientific basis or data to support. It is unclear how running water occasionally through ephemeral streams will recharge the aquifers in the west county. No scientific studies are included in Project Information to show the varied underground geology of the west county, to show if there are areas suitable for groundwater recharge, or to demonstrate that groundwater recharge through streams would actually occur in our complex foothill lands or have any effect on the Eastern San Joaquin Groundwater Basin. In fact, there is evidence to the contrary, pointing to the ineffectiveness of groundwater recharge from surface water in western Calaveras County. On August 24, 2011, the initial results from two nested groundwater monitoring well sites were presented to the CCWD Board. Loren Metzger, a Hydrologist with USGS Water Resources Division, presented findings indicating that the age of the groundwater was between 2200 and 13,400 years old, and that recharge was very limited or very slow and not readily occurring in the west county. What evidence is there that west county groundwater would be recharged with this pumping project?	The project team will review these additional comments with CCWD and scores will be revised, as appropriate.
8	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	"Water will be pumped over the northwest ridge of New Hogan Reservoir to a 30 acre-foot reservoir to regulate flows to ...streams." There are no details included about this reservoir—does it exist or will a new reservoir need to be constructed? Where is it to be located—on private development land or public agency land? Is the reservoir tied into the US Army Corp of Engineers-Calaveras County Cosgrove Creek Flood Reduction feasibility project (as the project description mentions as a possibility)? If so, is the County of Calaveras and the ACOE aware of this and on board with the development of the New Hogan pumping project and reservoir?	If more information is available, CCWD will be asked provide it. It may not be available because this project is at the conceptual level.

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9	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	What is the service area for the New Hogan water pumping project and the Water Distribution Loop--is the "service area" the entire west county area? What is the water to be used for—agriculture, groundwater recharge, residential growth, potable or non-potable raw water use, or all of the above? The project descriptions and service areas are too broad, contradictory, and unclear. The project description for the pumping project first says "a pumping plant and water conveyance facilities are proposed to deliver New Hogan Reservoir water to the communities", and lists six different, widely dispersed residential communities in the Camanche/Valley Springs area. Later in the paragraph it states "The water delivered to the service area will be used for agriculture and conjunctive use" and in the following paragraph, "The project will allow...greater capacity to meet growing water supply needs for agriculture and growth in the west county area." In the Water Distribution Loop project description it proposes interconnecting with both the potable water system serving Valley Springs/Rancho and the New Hogan Pumping Project "that proposes to provide raw water to the western Calaveras County area to stabilize dropping groundwater levels" and then it talks about delivering potable and raw water to western Calaveras users. How can a water distribution loop interconnect with both potable and non-potable water—don't raw and potable water need to be in separate delivery systems? Where are these two water projects proposing surface water be taken—what is the destination? What is the purpose?	If more information is available, CCWD will be asked to provide it. It may not be available because this project is at the conceptual level.

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10	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	Has it been adequately demonstrated that there is a need and demand for more water for irrigated agriculture and for residential growth in western Calaveras? The June 2011 report cited for irrigated agriculture development shows that because of significant development and parcelization since the mid-70s there are only 3,416 acres in the Valley Springs area of 'Lands Meeting Criteria' of 'Suitability for Agricultural Production' (pg. 10). The report also states "there are a number of questions that need to be answered and items that need to be verified" which include "This initial analysis utilizes a dataset of information that is 30 to 45 years old and has not been verified", "A determination needs to be made to estimate how much agriculture could pay for water and infrastructure, while still yielding a reasonable profit to the grower to entice agricultural development", and "Evaluate the community support for developing agriculture. It is anticipated that some opposition to agriculture would be present, either because of changes to the landscape or the perception that urban areas would subsidize agriculture." There are no reports or studies attached showing a need for more water for residential growth in western Calaveras. In fact, CCWD Jenny Lind WTP and Hogan Dam water supply studies assure local residents that they have plenty of water available now and in the future.	An Ag Demand Study is currently underway. Upon completion, if additional information is available, CCWD will be asked to provide it.
11	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	The #24 Camanche-New Hogan Ph. II Water Distribution Loop Project "is in conceptual/pre-design phase with continuing work necessary to complete the project description." We agree! The project description is so preliminary it reads more like "pie-in-the-sky": "The Phase II water distribution intertie loop between the Mokelumne and Calaveras systems will provide greater flexibility and reliability in delivering potable and raw water to the western Calaveras County users, mitigate groundwater overdraft in Eastern San Joaquin Groundwater Sub-Basin, and provide the opportunity to implement conjunctive." And supposedly this will also provide "Water Supply Benefits of New Supply: 28,000 AF/YR." How all that's going to happen for only $3 million is not clear (the construction cost estimate of $3 million includes only an "initial intertie" for one portion of the project). "Additional conveyance facilities...may add to this cost." What is the actual project going to be, what are actual costs, and are these costs economically feasible when added to Ph. I and Hogan Pumping project costs (which are linked)?	Projects included in the MAC Plan Update can range from the conceptual level to projects that are ready for construction. The only work that has been completed are preliminary and any work that is completed in the future will refine existing estimates.

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12	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	Both #23 & #24 project descriptions suggest integrating and linking New Hogan Reservoir pumping operations and the Camanche-New Hogan Phase II Water Distribution Loop Project with the Mokelumne River Forum's effort to develop an Inter-Regional Conjuntive Use Program, San Joaquin County's MORE water project, and the South Shore Camanche Regional Water Treatment Plant. MyValleySprings.com is strongly opposed to the MORE water project and any linkage to it from New Hogan Reservoir or the Water Loop Project. The MORE water project proposes to build a new 200,000 acre-foot Duck Creek Dam and Reservoir by condemnation and inundation of thousands of acres of protected conservation easement ranch lands in eastern San Joaquin County. We do not support the MORE water project, and we do not support diverting New Hogan Reservoir storage water for the purpose of supplying San Joaquin County's "Beneficial Use Area" or recharging the aquifer in San Joaquin County.	The form is inaccurate; IRCUP is no longer a project under consideration. Therefore, Projects 23 and 24 are not linked to IRCUP. These projects are also not linked to CARWSP. The CARWSP description is being updated and will be available for review/comment on 1/3/13.
13	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Projects 23 and 24	As the above questions show, ambiguous and grandiose projects and descriptions raise many potential obstacles to implementation. The public is almost entirely unaware of these current project proposals. Given the large geographic area, scope and ambitious goals, potential environmental impacts, potential impacts to agriculture and residential growth, the history of water development in Calaveras, and the high costs of these proposals, Project #23 and #24 are likely to be highly controversial when the public becomes aware of them. Previous proposals for development of irrigated agricultural in the west county generated controversy and resistance; a bond measure was defeated at the polls in 1974. Before IRWMP Policy 4 Goal can be met (prioritizing projects with the best likelihood of being completed), these two projects need public outreach and buy-in, need more detail and data, and need to work with stakeholders and agencies in order to "Focus on Areas of Common Ground and Avoid Prolonged Conflict."	Both projects 23 and 24 are at the conceptual level. There has not been extensive project development, public outreach, environmental analyses, etc. Public outreach and additional project development will be completed in the future.

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14	Colleen Platt, MyValleySprings.com	10/2/2012	Section 4 - Implementing Projects and Programs, Project 26	MyValleySprings.com also is concerned about CARWSP Project #26 (Camanche Area Regional Water Supply Project), although this project appears to be still in the planning stage with various agencies. We question inclusion of the Burson area ("Burson North" and "Burson South", as was shown on the "Potential Areas to be Served" map). The Burson area has a very small community center area and consists mostly of large-lot parcels served by wells. It is not an "area approved for development" that we're aware of. The scope, objectives, capacity, and potential areas to be served by CARWSP are unclear at this time.	Burson will not be included in the project service area. The scope, objectives, capacity, and potential areas to be served by CARWSP will be clarified in a CARWSP plan (draft out in early January 2013).
RPC Member Comments					
16	Tom Infusino, Calaveras Planning Coalition	10/18/2012	2 - Governance	To respond to the Challenge, Improve Public Outreach: Include in the final plan the attendance sheets for the RPC meetings and the public workshops, so that the actual levels of stakeholder and public participation are reflected.	Meeting minutes (which include attendance) will be included in the document.
17	Tom Infusino, Calaveras Planning Coalition	10/18/2012	2 - Governance	To respond to the Challenge, Improve Public Outreach: Over the course of next year, hold a series of individual meetings to invite key missing stakeholder groups to put their two cents worth in on the plan (i.e. city and county governments planning and health department staff, school districts, Calaveras COG & ACTC, electrical utilities, Native American tribes, self-supplied water users, community organizations, tax-payer and ratepayer groups, recreational interests, industry organizations, state and federal agencies, and disadvantaged communities.). For example, on one day you could have a meeting with City and County planning staff, COG staff, ACTC staff, School Districts. If this does not work, delegate to RPC volunteers the responsibility of meetings one-on-one with additional stakeholder groups or their representatives. Provide RPC volunteers with questions to ask and materials to share. Note the suggestions of these new stakeholders. If project ideas result from these meetings, encourage participants to sponsor or cosponsor a project proposal for addition to the plan. Prior to the 2014 grant package submittal, add notes on the new stakeholders' suggestions in the implementation section, and amend the plan as needed based upon their suggestions.	The MAC Outreach and Communications Plan will be revised as part of the next IRWMP Update to address this comment. Section 4.1.5 Considerations for Future Plan Updates will be edited to include this suggestion.

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18	Tom Infusino, Calaveras Planning Coalition	10/18/2012	2 - Governance	To respond to the challenge, No RPC policy on information collection, review, and inclusion in the plan. Recommendation: Include the public comments in the plan verbatim.	Comment letters will be included with Plan, but a policy for collecting and addressing public comments will be considerd as part of a future update to the Outreach and Communications Plan (see comment 17).
19	Tom Infusino, Calaveras Planning Coalition	10/18/2012	2 - Governance	To respond to the challenge, No RPC policy on information collection, review, and inclusion in the plan. Recommendation: Review and respond to the public comments.	Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.
20	Tom Infusino, Calaveras Planning Coalition	10/18/2012	2 - Governance	To respond to the challenge, No RPC policy on information collection, review, and inclusion in the plan. Recommendation: Consider making changes in the draft document based upon public comments on the draft.	Underway
21	Tom Infusino, Calaveras Planning Coalition	10/18/2012	2 - Governance	To respond to the challenge, No RPC policy on information collection, review, and inclusion in the plan. Recommendation: Delegate to a committee the preparation of new guidance for the way that information will be received, reviewed, and accepted into the plan in future amendments and updates.	Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.

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22	Tom Infusino, Calaveras Planning Coalition	10/18/2012	2 - Governance	To respond to the challenge, To Improve the balance of power to promote collaboration: choose an alternative, proposed by Alyson Watson. The Foothill Conservancy has also suggested that planning agencies, tribal representatives, DAC representatives, conservation groups, and others stakeholders should be allowed to serve at any level of the governance structure, which would mean that UMRWA could not be the final decision body. There might need to be some agreement about principles to which all participants would have to adhere so people can't just jump in to kill and project and jump out. All decisions could be made by consensus of the parties. There could be a memorandum of understanding developed, that all parties would have to sign, describing both how the final decision-making body would function, and the details their roles and responsibilities. If those recommendations do not resolve the governance problems, the RPC could delegate to a balanced committee the preparation of new guidance for MAC IRWMP governance.	The governance structure has been endorsed by the RPC on two occasions. However, we will bring the three recommendations to the RPC for consideration. The RPC's recommendations will ultimately be a recommendation to UMRWA. Per the IRWM guidelines, the RWMG is tasked with defining the appropriate governance structure.

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23	Tom Infusino, Calaveras Planning Coalition	10/18/2012	2 - Governance	To respond to the challenge, to provide examples of circumstances that will trigger plan amendment: Please include in the final plan some examples of circumstances that would trigger a plan amendment. For example: A plan change will be made to incorporate the results of plan monitoring. A plan change will be made when project-specific monitoring indicates that a project will not achieve one of its asserted benefits, or will exceed its reported costs. A plan change will be made when the plan or a project is modified through adaptive management. A plan change will be made when heretofore missing information becomes available (e.g. input from missing stakeholders, results of modifying the governance structure, updated information about the regional description, new project applications, project-related operation and maintenance costs, or new information from updated local water plans or land use plans.) A plan change will be made when needed to address new IRWM Guidelines.	These suggestions can be incorporated, but it must be noted that it is contingent on available resources.
24	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: On page 1-2 of the section, change “Sierra Nevado” to “Sierra Nevada”.	Will be incorporated
25	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: On page 1-15 of this section add to Table 1-3 the San Andreas Sanitation District.	Will be incorporated
26	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: On page 1-18, please change the name from the “Electra Run” to the “Electra and Middle Bar Runs”.	Will be incorporated
27	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: On page 1-18, delete the phrase “and above Highway 49.” To the list of other recreational activities, please include “wading, wildflower viewing, gold panning, and spiritual rejuvenation.”	Will be incorporated

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28	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: On page 1-21, there are statements that the IRWMP is not intended to drive the General Plan Update process or to influence growth or growth patterns in Amador and Calaveras Counties. Again, rather than state the intent, state the actual facts. Recommendation: In the Final MAC IRWMP Update, admit that some of the water projects in the IRWMP have land use implications. That is no surprise to anyone. Water agencies supply water to people using land (e.g. farmers, ranchers, residents, businesses, and industries.) It is far more credible to simply admit that fact, than it is to imply that all the water projects have no land use implications, or that the water projects are not "intended" to have land use implications.	The Plan is not intended to drive the GP process. However, we can ackoweldge that projects may have land use implications.
29	Tom Infusino, Calaveras Planning	10/18/2012	All	To respond to the Challenge, to get the regional details right: Please standardize page numbers among the IRWMP chapters.	Will be incorporated
30	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: On page 1-21, the IRWMP indicates that the MAC IRWMP Region "is home to approximately 130,000 people." Where does that very high estimate come from? It is not consistent with the County and City population data provided on page 1-13. The population and population density data on page 1-21 of the Draft MAC IRWMP need to be corrected.	The 130,000 is incorrect. This number will be modified.
31	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: On page 1-23, the list of DACs in the text includes Sutter Creek two times. Please delete one of these listings. Also, River Pines is not on that list. Please add it.	Sutter Creek will be deleted and River Pines will be added.
32	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: Are the listed unincorporated town DACs along Highway 4 (Murphys, Avery, and Dorrington) part of the MAC IRWMP or Part of the Stan-T IRWMP? None of these towns or their special districts participated in the MAC IRWMP Update. Did they participate in the Stan-T IRWMP?	We believe Murphys, Avery, and Dorrington are participating in the T-Stan. During the next IRWMP Update, the Outreach and Communications Plan will be revised, and participation by agencies with land use authority will be identified as a priority. This will also be described in the land use planning section (under development).

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33	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: Page 1-27 states, "The regional water supplies and demands included in this section are based on the best available information and projections." Again this is another example of the IRWMP's "one-sided and too rosy a picture of the actual planning process."	Per the Guidelines, the IRWMP is not intended to replace or supercede local planning. We interpret this to include UWMPs. We will revise to be clear that these are based on agency estimates.
34	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: The AWA estimate is based upon "the projected growth described in the local general plans." What does that mean? Some of the growth estimates in the local government general plans are not based upon current or reliable data. The Sutter Creek general plan dates from 1994. The Amador County General Plan was approved in 1974. Is that the growth data used by AWA to estimate future demand? Since then, those local governments have updated their Housing Elements with more current growth data. Is that the data used by AWA? Mysteriously, the AWA increased its estimate of Amador County's average annual growth rate from less than 1% in the old UWMP to 1.8% in the new UWMP. Although the Foothill Conservancy asked for some explanation during the UWMP update in 2011, none was forthcoming. (Exhibit 12, Foothill Conservancy on AWA UWMP.)	Per the Guidelines, the IRWMP is not intended to replace or supercede local planning documents, so we are using the information provided in local water plans.

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35	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: On page 1-31, the demand figures for CCWD include a growth in raw water demand for the Valley Springs Area of nearly 16,000 acre-feet per year by 2035. This is based upon a study that identified the need for over 100,000 acre-feet of water per year to irrigate 29,000 acres of agricultural land in Calaveras County. On page 1-31, the demand figures for CCWD include a growth in raw water demand for the Valley Springs Area of nearly 16,000 acre-feet per year by 2035. This is based upon a study that identified the need for over 100,000 acre-feet of water per year to irrigate 29,000 acres of agricultural land in Calaveras County. (Exhibit 13, CCWD Irrigation Study, p. 10.) However, that study recognizes huge deficiencies in the data, not the least of which is that parcelization and development in the rapidly growing Valley Springs area over the last 40 years has gobbled up much of the acreage previously considered suitable for irrigation. The study also generally cautions that "this analysis utilizes a data set that is 30 to 45 years old. This information needs to be verified and 'ground truthed' before committing to plans for agricultural development." (Exhibit 13, CCWD Irrigation Study, pp. 10 & 12.) Recommendation: In the Final MAC IRWMP, admit the weaknesses in the water demand projections for the region, and identify a project to improve the	Per the Guidelines, the IRWMP is not intended to replace or supercede local planning documents, so we are using the information provided in local water plans.
36	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: Section 1.4 discusses water resource issues and major conflicts. Many of these issues are covered in only a single inaccurate sentence presenting false dichotomies. For example, "Watershed protection versus community economic needs." There is no need for watershed protection to conflict with community economic need. This is being proven by the Amador Calaveras Consensus Project that is putting people back to work in the forest; this time on restoration and fuel reduction projects. If the phrase was "Watershed protection versus watershed damaging forestry practices" then it would reflect a true conflict and a true dichotomy. Recommendation: In the Final MAC IRWMP, rephrase the water conflicts noted above so that they accurately represent the true areas of conflict.	The conflicts were identified and defined by the RPC, and subsequently endorsed by the RPC.

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37	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	For another example, "Insufficient groundwater quantity and quality to accommodate growth." What does that mean? Does it mean insufficient groundwater quantity and quality to build out isolated rural parcels at their maximum allowed land use intensity under the existing General Plan and Zoning? If so, that does reflect real conflict among groundwater users. Recommendation: In the Final MAC IRWMP, rephrase the water conflicts noted above so that they accurately represent the true areas of conflict.	Regional conflicts change over time. The conflicts included in the IRWMP Update were discussed at the beginning of the update process and endorsed by the RPC on 10/12/2011. They should be revisited as part of the next plan Update. Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.
38	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: Yet another example, "Obtaining Wild and Scenic River status versus preserving opportunity to develop additional surface water storage." This is another false dichotomy. The only surface water storage that Wild and Scenic River Status prevents is on-stream storage. Wild and Scenic River Status will not affect existing water rights, and will not prevent the development of off-stream storage facilities. If the issue is "Obtaining Wild and Scenic River Status down to Pardee Reservoir versus preserving the opportunity to inundate more of the Mokelumne River with dams," then that would reflect a true dichotomy and a true conflict. Recommendation: In the Final MAC IRWMP, rephrase the water conflicts noted above so that they accurately represent the true areas of conflict.	Regional conflicts change over time. The conflicts included in the IRWMP Update were discussed at the beginning of the update process and endorsed by the RPC on 10/12/2011. They should be revisited as part of the next plan Update. Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.

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39	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: Yet another example, "Protecting and improving fish passage on the lower Mokelumne and Calaveras Rivers versus river-sourced water supply development needs and opportunities." Trap and haul operations could improve fish passage without large reductions in water supply development projects. Also, Calaveras County could perfect its area of origin water rights well before they are needed for domestic use, by storing and releasing the water to improve fishery conditions. In these ways, fishery improvements can occur without serious harm to water project operations. If the phrase is "Protecting and improving fish passage on the lower Mokelumne and Calaveras Rivers at the water diverters expense," then you do identify a true conflict and a true dichotomy. Recommendation: In the Final MAC IRWMP, rephrase the water conflicts noted above so that they accurately represent the true areas of conflict.	Regional conflicts change over time. The conflicts included in the IRWMP Update were discussed at the beginning of the update process and endorsed by the RPC on 10/12/2011. They should be revisited as part of the next plan Update. Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.
40	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right: I have no idea what is meant by, "Wastewater treatment levels and technology versus environment and benefits." Recommendation: In the Final MAC IRWMP, rephrase the water conflicts noted above so that they accurately represent the true areas of conflict.	Regional conflicts change over time. The conflicts included in the IRWMP Update were discussed at the beginning of the update process and endorsed by the RPC on 10/12/2011. They should be revisited as part of the next plan Update. Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.
41	Tom Infusino, Calaveras Planning Coalition	10/18/2012	1 - Region Description	To respond to the Challenge, to get the regional details right. Recommendation: Make sure the crosswalk between the sections in the MAC IRWMP and the IRWM standards they cover is in the Final MAC IRWMP Update.	This will be completed.

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42	Tom Infusino, Calaveras Planning Coalition	10/18/2012	3 - Goals, Objectives, Strategies, and Performance Measures	To respond to the Challenge: To select useful Goals and Objectives without RPC members killing one another. Recommendation: In preparing the Final MAC IRWMP, rewrite page 1 of Section 3.1 to report to DWR and the public the actual nature of the process, rather than some fictitious ideal.	Per DWR's regional representative, the process undertaken was collaborative, and characterizing it as such is accurate. The goals and objectives were revised extensively to incorporate comments from the Calaveras Planning Coalition and other RPC member comments.
43	Tom Infusino, Calaveras Planning Coalition	10/18/2012		To respond to the Challenge: To chart a course from regional water management chaos toward order. The public outreach efforts have not resulted in meaningfully involving a diverse group of stakeholders, and many necessary stakeholders did not participate in the process. (See comments on Governance and Stakeholders)	The MAC Outreach and Communications Plan will be revised as part of the next IRWMP Update to address this comment.
44	Tom Infusino, Calaveras Planning Coalition	10/18/2012		To respond to the Challenge: To chart a course from regional water management chaos toward order. It is still not clear how non-agency stakeholders can contribute data to the process, how their comments will be included in the plan, and how they are to interface with agencies when monitoring data raises concerns. Thus we have not effectively integrated the public's role into the data management and project monitoring functions of the MAC IRWMP. Furthermore, there is still no certain funding for plan implementation monitoring. Thus we have failed to integrate plan monitoring, and the adaptive management processes that should follow it, into the MAC IRWMP. (See Data Management and Plan, Project Review Process, Performance Monitoring, and Governance comments.)	Comment noted.
45	Tom Infusino, Calaveras Planning Coalition	10/18/2012		To respond to the Challenge: To chart a course from regional water management chaos toward order. Critical cost and cost share data is missing from the Finance Section, and thus we are not effectively integrating ratepayer concerns into the MAC IRWMP Update process. (See comments on Finance.)	The section was revised to address this comment by indicating that additional data should be added when available. This is also cited in Section 4.1.5 Considerations for future plan updates.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
46	Tom Infusino, Calaveras Planning Coalition	10/18/2012		To respond to the Challenge: To chart a course from regional water management chaos toward order. While the data from local water plans is being used in the IRWMP, it is being used uncritically, without regard for its quality or uncertainty. Integration of bad information into the MAC IRWMP Update is not the objective of the integration standard. (See comments on Governance, Regional Description, Relation to Local Water Planning, and Technical Analysis.)	Per the Guidelines, the IRWMP is not intended to replace or supercede local planning documents, so we are using the information provided in local water plans.
47	Tom Infusino, Calaveras Planning Coalition	10/18/2012		To respond to the Challenge: To chart a course from regional water management chaos toward order. There is precious little integration of water planning efforts and land use planning agency expertise and activities. (See comments on Relation to Local Land Use Planning.)	Comment noted.
48	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.1 - Project Review Process	To respond to the Challenge: to accurately convey the project review process and results. Recommendation: Add a project call in May of 2013 to strategically include more projects that address the policies, statewide priorities, and resource management strategies that are currently under-subscribed on the project list.	Refer to section 4.1.1, which calls for project solicitations every two years (provided funding is avilable).
49	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.1 - Project Review Process	To respond to the Challenge: to accurately convey the project review process and results. Recommendation: Identify who rated the projects for each criterion, and the information used as the basis for this rating.	The RPC is responsible for project review, based on the information in the project information forms and plan evaluation criteria. All of this information is included in the plan. We will clarify in Section 4.1 of the plan that the RPC is responsible for project review and evaluation.
50	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.1 - Project Review Process	To respond to the Challenge: to accurately convey the project review process and results. Recommendation: Disclose those criteria for which the ranking is based upon the proponent's self-assessment.	While the initial scores for some criteria were based upon a self-assessment, the RPC is responsible for project review, based on the information in the project information forms and plan evaluation criteria. All of this information is included in the plan.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
51	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.1 - Project Review Process	To respond to the Challenge: to accurately convey the project review process and results. Recommendation: Change the score ranges that result in a High, Low and Medium final priority to get a more normal distribution of the project rankings. For example, if 6 or more high scores resulted in a final High ranking, then 11 projects would be ranked High. If three or fewer high scores resulted in a final Low ranking, there would be 8 projects ranked low. If 4 or 5 high scores resulted in a ranking of Medium, then 18 projects would be ranked Medium.	Recommending a change in scoring to the RPC.
52	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.1 - Project Review Process	To respond to the Challenge: to accurately convey the project review process and results. Recommendation: Include an additional table in this section of the IRWMP that reflects how public comments on the project list ranked the projects with regard to "minimize risk of implementation" and "best project for intended purpose." This information could be useful when the RPC and UMRWA consider which projects to include in a grant package for 2013. This table could help us achieve our goal of prioritizing projects that have the best likelihood of being completed in the planning horizon, and our policy of focusing on areas of common ground and avoiding prolonged conflict. Also, this table will provide DWR with the relevant information, and lets DWR decide what weight to give those comments. To withhold that information from DWR is not consistent with the intent of the public participation requirements of the IRWMP Guidelines. (2010 IRWMP Guidelines, pp. 20, 22, 23, 24, 27, 39, 56, 64-66.)	The RPC considers public comments, but ultimately decides on the project ranking. All public comments will be included with the plan.
53	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.1 - Project Review Process	To respond to the Challenge: to accurately convey the project review process and results. Recommendation: Correct the new paragraph in Section 4.1.3 so as not to imply that the project review process is resulting in a consensus among RPC members with equal bargaining power, and to avoid exaggerating the depth of agreement being reached over the projects and their scores.	Cited text is a fair description of the vetting process and outcome.
54	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.1 - Project Review Process	To respond to the Challenge: to accurately convey the project review process and results. Recommendation: To the list in Section 4.1.5 of considerations for future updates add the items listed in Exhibit 18 to these comments.	Repeat of comment 46

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
55	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.1 - Project Review Process	To respond to the Challenge: to accurately convey the project review process and results. Recommendation: Add an appendix to the final MAC IRWMP Update that includes the project applications.	This will be completed.
56	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.3 - Impact and Benefit Analysis	To respond to the Challenge: To provide a general, balanced, comprehensive, and accurate the discussion of impacts and benefits. Recommendation: Change the term "economic benefit" to "local prosperity" in Table 4-1.	Incorporated
57	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.3 - Impact and Benefit Analysis	To respond to the Challenge: To provide a general, balanced, comprehensive, and accurate the discussion of impacts and benefits. Recommendation: Add the additional impacts noted above to Table 4-1. Wherever the potential benefit is identified as "Economic Benefit", the flip side of the project's potential impacts must also be recognized. For example, as noted above, using this funding mechanism to finance local infrastructure in one place actually poses a real cost to those from another place who pay their taxes, but do not benefit from the program. Thus there is an interregional potential impact of economic loss. For yet another example, those places that do get grants may create economic hardship for ratepayers who have to come up with the matching funds and operation and maintenance costs. If the ratepayers refuse the rate increase to pay for the operation and maintenance costs, the grant receiving agency may be thrown into fiscal crisis. With regard to conjunctive use, this benefit comes with a cost to freedom of groundwater use. Those who use groundwater without regulation now will have to come under regulation for conjunctive use to work. This potential impact can be characterized as new regulation or loss of freedom. With regard to water supply projects and storage facilities, one of the major impacts is recreational use displacement. People who liked flowing water recreation may have that recreation displaced by a reservoir. Finally, with regard to water supply, water storage, water conveyance, and water treatment facilities, growth inducing and secondary impacts from growth may result.	An impacts section was added to address this comment.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
58	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.3 - Impact and Benefit Analysis	To respond to the Challenge: To provide a general, balanced, comprehensive, and accurate the discussion of impacts and benefits. Recommendation: Balance the presentation of benefit and impact information in Section 4.3.2, so that the description of potential impacts is followed by a list of the type of projects that could generate that impact.	Incorporated
59	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.3 - Impact and Benefit Analysis	To respond to the Challenge: To provide a general, balanced, comprehensive, and accurate the discussion of impacts and benefits. Recommendation: Add a paragraph on the potential of Duck Creek Reservoir to end the use of conservation easements as we know them.	This comment is specific to a project not included in the IRWM Plan.
60	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 5.1 - Plan Performance and Monitoring	To respond to the Challenge: To fund plan performance monitoring and specify adaptive management procedures. Recommendation: Make a definitive commitment to fund plan monitoring.	See comment 64.
61	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 5.1 - Plan Performance and Monitoring	To respond to the Challenge: To fund plan performance monitoring and specify adaptive management procedures. Specify the adaptive management procedures in a way that identifies who will do what, when, and how. Which decision-making structure will be activated? Will the RPC or UMRWA, that recommended the project for funding, review the project monitoring data to see if it meets the objectives of the MAC IRWMP? Will the implementing agency review the project implementation to see if it is meeting the agency primary objectives, which may not be as broad as those of the IRWMP? Will DWR, the project's funding partner, review the data to see if it meets DWR's primary objectives, which also may differ from those of the agency or the IRWMP? Will any of these evaluations alert the public that this review and reconsideration of these projects is going on, and that public input is welcome?	The Plan Administration section describes the process for collecting and considering data related to the performance measures and how that data will be used to determine if plan changes are neeed.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
62	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 5.2 - Data Management	To respond to the Challenge: To provide a platform for sharing information that is a two way street. Recommendation: Identify ways that the public and stakeholders other than project sponsors can provide information to the DMS. Draft IRWMP Section 5.2 deals with data management. It explains how project sponsors can provide information to the centralized DMS. However, there is no indication of how members of the public, or those on the RPC who are not project sponsors, can provide information to the centralized DMS. These stakeholders must also be allowed to contribute data in some fashion.	It is beyond the scope of the IRWM program to collect data from the public. The data management standard relates specifically to data colelction to assess plan performance.
63	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 5.2 - Data Management	To respond to the Challenge: To provide a platform for sharing information that is a two way street. Recommendation: Provide instructions for the public and stakeholders to communicate concerns to the relevant authorities, in a manner that will result in a prompt response to the concern. Page 7 of Part 2 of the comment letter describe this in more detail.	If individuals have concerns with specific agencies, those concerns should be addressed with those agencies, rather than through the IRWM program.
64	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 5.2 - Data Management	To respond to the Challenge: To provide a platform for sharing information that is a two way street. Recommendation: Make a clear and unambiguous commitment to plan monitoring and data collection, and identify the means for funding the efforts.	Absent known and reliable sources of funding, we cannot commit to extending beyond what is articulated in the current draft section.
65	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 5.2 - Data Management	To respond to the Challenge: To provide a platform for sharing information that is a two way street. Recommendation: Add the data gaps noted above to the list on pages 8 and 9 of Section 5.2.1 of the Draft IRWMP. Fill those gaps. -Identifying the natural hydrograph for ephemeral the streams that CCWD wants to use to distribute water. -Getting AWA to complete a strategic capital improvement plan that assesses the cost of projects per beneficiary, and assess ratepayer ability and willingness to pay for infrastructure improvements. -Identifying and reconciling the growth projections in Amador and Calaveras counties used by the local, regional, and state planning and public service agencies; and the expected level of growth that can be accommodated by these agencies without a decline in level of service.	These comments should be directed to AWA and CCWD and incorporated into local planning processes.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
66	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 5.2 - Data Management	To respond to the Challenge: To provide a platform for sharing information that is a two way street. Recommendation: Work out the deal with EBMUD to store the DMS on their server.	Complete. It is the responsibility of UMRWA, but it will physically reside on EBMUD's computer system.
67	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.4 - Financing	To respond to Challenge: Disclosing O& M costs and the percentages of funding from each source. Recommendation: Disclose expressed concerns by the Ratepayer Protection Alliance that, in practice, capacity fees charged by the AWA are resulting in an inequitable share of costs being borne by existing customers relative to future customers.	RPA submitted project-specific comments; these will be included as an appendix to the Plan. RPA has not submitted other comments.
68	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.4 - Financing	To respond to Challenge: Disclosing O& M costs and the percentages of funding from each source. Recommendation: Delete the recycled water example from the discussion of “O&M” costs.	Changed to a wastewater example.
69	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.4 - Financing	To respond to Challenge: Disclosing O& M costs and the percentages of funding from each source. Recommendation: As discussed at the RPC meeting on September 24, encourage project proponents to estimate the O&M costs and the local cost shares as soon as possible, and add them to the table in Appendix B by 2014.	A footnote has been added to the table stating that as O&M costs are developed, they will be added.
70	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.4 - Financing	To respond to Challenge: Disclosing O& M costs and the percentages of funding from each source. Recommendation: When considering projects for the 2014 grant package, the RPC may want to favor those noncontroversial projects that also have estimated O&M costs and local cost share percentages.	Various factors will help choose projects for inclusion in the 2014 grant application.
71	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.5 - Technical Analysis	To respond to the Challenge: To disclose the uncertainty regarding data, and the need to fill data gaps. Recommendation: Before 2014, review the studies that form the basis for the MAC IRWMP and the technical feasibility of the projects. Assess the reliability of their data, and put that information in the tables in Sections 4.2.2 and 4.5.	Per the Guidelines, the IRWMP is not intended to replace or supercede local planning documents, so we are using the information provided in local water plans.
72	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.5 - Technical Analysis	To respond to the Challenge: To disclose the uncertainty regarding data, and the need to fill data gaps. Recommendation: where those studies identify data gaps, identify those gaps in Section 4.5.	Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
73	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.5 - Technical Analysis	To respond to the Challenge: To disclose the uncertainty regarding data, and the need to fill data gaps. Recommendation: Include in the IRWMP a request for funding to fill the data gaps in the documents upon which the plan relies.	Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.
74	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.5 - Technical Analysis	To respond to the Challenge: To disclose the uncertainty regarding data, and the need to fill data gaps. Recommendation: if the data gaps are related to specific proposed projects, add to those project proposals the completion of the additional studies, and the funding needed to complete them.	It is up to project proponents to determine what portions of projects are included in their proposals.
75	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.2 - Coordination with Water and Land Use Agencies	To respond to the Challenge: To include the whole truth in the IRWMP Update. Recommendation: First, edit the discussion of IRCUP, to provide a detailed explanation of how it failed, and to explain how it was not a collaborative effort of relevant regional stakeholders. After that, feel free to acknowledge what was learned, and how we hope to avoid this mistake in the future. If we cannot demonstrate adaptive management based upon the 2006 MAC IRWMP, how can we convince DWR we will do adaptive management in the future?	Edits will be made.
76	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.2 - Coordination with Water and Land Use Agencies	To respond to the Challenge: To include the whole truth in the IRWMP Update. Recommendation: in the section regarding the local water planning documents used in the IRWMP, please delete the three misleading introductory sentences to Section 4.2.2 on page 9, and instead provide a detailed explanation of the unresolved controversy over the quality of the water demand data.	Per the Guidelines, the IRWMP is not intended to replace or supercede local planning documents, so we are using the information provided in local water plans. These issues should be addressed with the specific local agencies.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
77	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.2 - Coordination with Water and Land Use Agencies	To respond to the Challenge: To improve the working relationship between land use planning and water agencies. Recommendation: during 2013 there needs to be meetings (or series of meetings) in Amador and in Calaveras counties so that each of the land use and public service agencies can present their long-term plans for serving existing residents and the additional population and economic growth they expect. Then they need to compare these plans for consistency. Where inconsistencies exist, the agencies and districts need to come to some agreement on some basic level of growth that they all can accommodate. Each agency can then make an interim plan to most efficiently and effectively serve the existing population and the additional basic level of growth. The projects that are needed to serve existing residents and that basic level of growth need to become a high priority for the agencies. Then, the projects in the IRWMP project's list can reflect those high priority projects. The MAC IRWMP can be amended to describe these meetings and to summarize their results. Since both Amador and Calaveras counties are in the middle of comprehensive General Plan Update processes, now is the perfect time to begin these agency coordination efforts, and to inform those planning processes.	Per the Guidelines, the IRWMP is not intended to replace or supercede local planning documents, so we are using the information provided in local water plans. These issues should be addressed with the specific local agencies.
78	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 4.2 - Coordination with Water and Land Use Agencies	To respond to the Challenge: To improve the working relationship between land use planning and water agencies. Recommendation: there needs to be a quarterly public meeting of these agencies to exchange current project lists and to consult each other regarding the lists. If we are not going to do the above, at least explain what is being done to coordinate water and land use planning in the MAC Region. For example, a draft water element for the Calaveras County General Plan Update includes many provisions for getting the County and the CCWD to work together better.	Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
79	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 2.3 - Stakeholder Involvement	To respond to the Challenge: To Improve Public Outreach. Recommendation: try to hold a series of individual meetings to invite key missing stakeholder groups to put their two cents worth in on the plan (i.e. city and county governments planning and health department staff, school districts, Calaveras COG & ACTC, electrical utilities, Native American tribes, self-supplied water users, community organizations, tax-payer and ratepayer groups, recreational interests, industry organizations, state and federal agencies, and disadvantaged communities.). For example, on one day you could have a meeting with City and County planning staff, COG staff, ACTC staff, School Districts. If this does not work, delegate to RPC volunteers the responsibility of meetings one-on-one with additional stakeholder groups or their representatives. Provide RPC volunteers with questions to ask and materials to share.	The MAC Outreach and Communications Plan will be revised as part of the next IRWMP Update to address this comment.
80	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 2.3 - Stakeholder Involvement	To respond to the Challenge: To Improve Public Outreach. Recommendation: Note the suggestions of these new stakeholders. If project ideas result from these meetings, encourage participants to sponsor or cosponsor a project proposal for addition to the plan. Prior to the 2014 grant package submittal, add notes on their suggestions in the implementation section, and amend the plan as needed based upon their suggestions. It is not too late for the MAC IRWMP Update to do a more comprehensive job of outreach to important participants. If we fail to do so, we will only have ourselves to blame should DWR find this flaw fatal to our MAC IRWMP.	The MAC Outreach and Communications Plan will be revised as part of the next IRWMP Update to address this comment.
81	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 2.3 - Stakeholder Involvement	To respond to the Challenge: To Improve Public Outreach. Recommendation: When the next comprehensive IRWMP Update takes place, work these stakeholder subcommittees into the regular planning schedule.	The MAC Outreach and Communications Plan will be revised as part of the next IRWMP Update to address this comment.
82	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 2.3 - Stakeholder Involvement	To respond to the Challenge: How to move from conflict and neglect toward collaboration. Recommendation: we strongly recommend that either AWA staff or IRWMP consultants find the time in the next three months to make the agreed upon amendments to the draft plan.	Amendments agreed upon in this matrix will be incorporated. Also, changes to project scoring and evaluation agreed upon through the vetting process have been incorporated into the Plan.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
83	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 2.3 - Stakeholder Involvement	To respond to the Challenge: How to move from conflict and neglect toward collaboration. Recommendation: in the final IRWMP, please disclose the whole truth about the results of the MAC and Eastern San Joaquin interregional coordination efforts, including the fact that it did not result in a set of projects that resolved regional conflicts.	IRCUP language will be revised per comment 75.
84	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 2.3 - Stakeholder Involvement	To respond to the Challenge: How to move from conflict and neglect toward collaboration. Recommendation: there is currently an ERC that includes stakeholders overseeing implementation of FERC Project 137 on the Mokelumne River. There is also an Amador Calaveras Consensus Group working with BLM and the USFS on forest restoration and fuel reduction projects. If the MAC IRWMP needs to improve coordination with federal agencies actively involved with watershed management, the IRWMP should commit to sending a delegate to attend one or more of these existing stakeholder groups, to provide information regarding IRWMP projects, and to report back to UMRWA.	The MAC Outreach and Communications Plan will be revised as part of the next IRWMP Update to address this comment.
85	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 1.3 - Climate Change	To respond to the Challenge: How to address climate change prevention and adaptation in a region that is not concerned about climate change? Recommendation: In the crosswalk table, add Section 3.1, Section 3.2, and Section 4.1 to the list of sections that address climate change mitigation and adaptation.	This will be incorporated.
86	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 1.3 - Climate Change	To respond to the Challenge: How to address climate change prevention and adaptation in a region that is not concerned about climate change? Recommendation: In Section 1.3, trace those primary physical changes noted (i.e. air temperature, water temperature, and water storage) down the chain of cause and effect to the ultimate impacts on the human environment, and to the means to reduce those impacts.	This has been completed (comments were submitted based on an incomplete climate change section). See updated section.
87	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 1.3 - Climate Change	To respond to the Challenge: How to address climate change prevention and adaptation in a region that is not concerned about climate change? Recommendation: Add to the project evaluation process a primary-level assessment of GHG reductions from each project. Explain that process in Section 1.3. Report the results in of the analysis in Chapter 4.	It is beyond the scope of this update to do a GHG analysis for all Plan projects. However, Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion, and a detailed GHG analysis will be completed for any projects included in an implementation grant proposal.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
88	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 1.3 - Climate Change	To respond to the Challenge: How to address climate change prevention and adaptation in a region that is not concerned about climate change? Recommendation: In the text of Section 3.1 of the final MAC IRWMP Update, specifically note the many goals, objectives, and policies that address climate change adaptation.	This will be incorporated.
89	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 1.3 - Climate Change	To respond to the Challenge: How to address climate change prevention and adaptation in a region that is not concerned about climate change? Recommendation: In the text of Section 3.2 of the final MAC IRWMP Update, specify the selected regional management strategies that address climate change adaptation.	This has been completed (comments were submitted based on an incomplete climate change section). See updated section.
90	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 1.3 - Climate Change	To respond to the Challenge: How to address climate change prevention and adaptation in a region that is not concerned about climate change? Recommendation: At the last RPC meeting, staff encouraged the water agencies to review their projects to see if any of them deserved a higher rating for climate change mitigation and adaptation. It is my recommendation that the RPC continue to look for additional climate change response projects, even after plan adoption in January 2013, and add them to the project list before 2014.	Projects have been reviewed with respect to climate change and adjusted scores will be presented to RPC at Nov 7 meeting.
91	Tom Infusino, Calaveras Planning Coalition	10/18/2012	Section 1.3 - Climate Change	To respond to the Challenge: How to address climate change prevention and adaptation in a region that is not concerned about climate change? Recommendation: Add to Section 5.1 a specific explanation of how monitoring and adaptive management will be used to respond to climate change challenges as new information becomes available	This has been completed (comments were submitted based on an incomplete climate change section). See updated section.
90	Tom Infusino	10/3/2012	MAC Plan Update Process	Infusino mailed 55 form comment letters signed by members of the public with the following comments to "Fix the MAC IRWMP".	Comment noted.
91	Tom Infusino	10/3/2012	MAC Plan Update Process	1) Establish a governance form granting all stakeholders equal power and voice.	See comment 22.
92	Tom Infusino	10/3/2012	MAC Plan Update Process	2) Make the IRWMP process a forum for resolving local water conflicts.	IRWMP is a forum for addressing regional conflicts, not local conflicts. Local issues should be addressed at the local agency level.

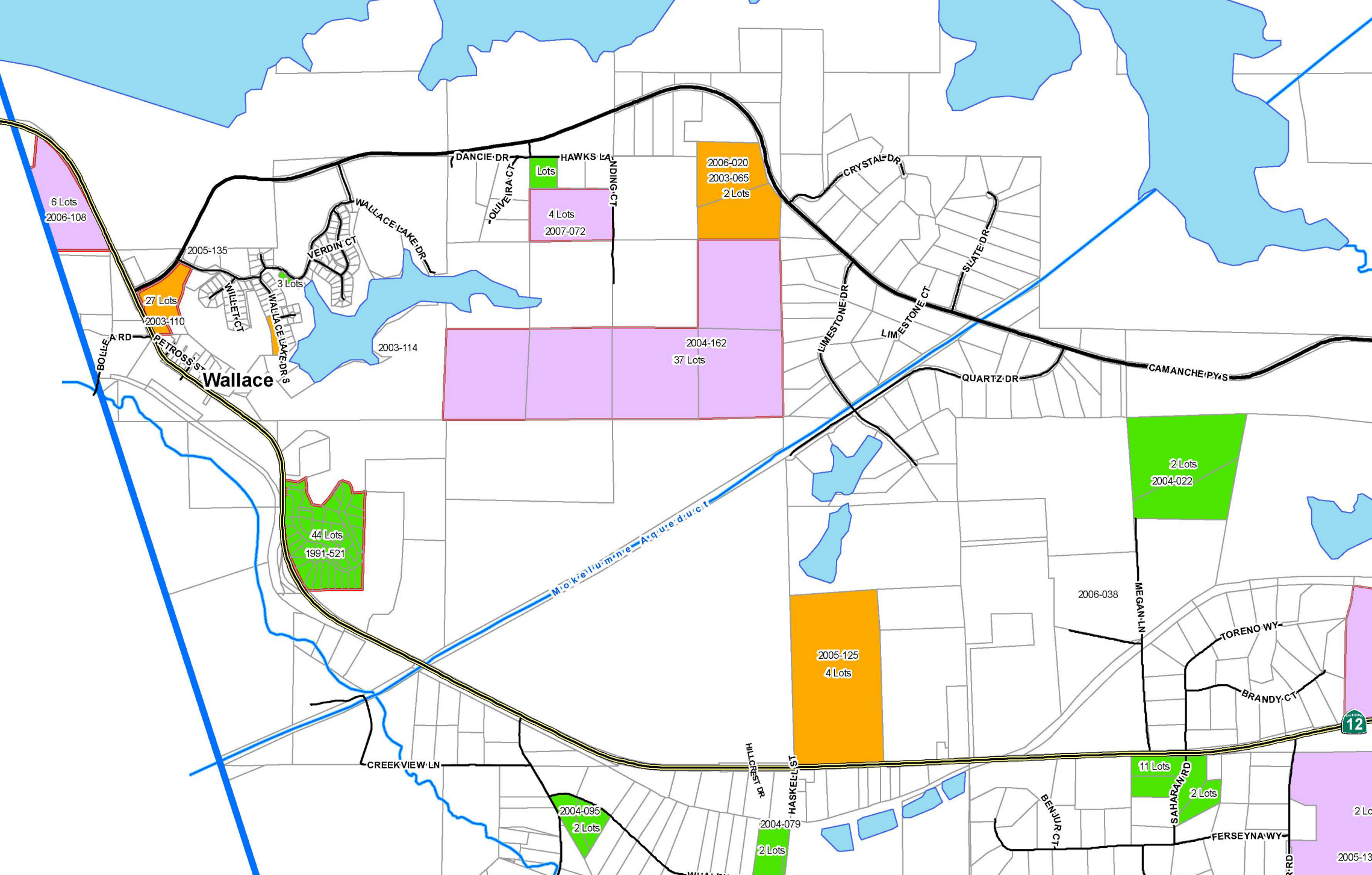
No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
93	Tom Infusino	10/3/2012	MAC Plan Update Process	3) Involve local agencies including planning departments, health departments, transportation agencies, and fire districts.	The MAC Outreach and Communications Plan will be revised as part of the next IRWMP Update to address this comment. Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.
94	Tom Infusino	10/3/2012	MAC Plan Update Process	4) Strengthen coordination with state and federal agencies including BLM, State Fish & Game, and the Regional Water Quality Control Board.	The MAC Outreach and Communications Plan will be revised as part of the next IRWMP Update to address this comment. Section 4.1.5 Considerations for future plan updates will be edited to include this suggestion.
95	Tom Infusino	10/3/2012	MAC Plan Update Process	5) Disclose the local cost share of each project.	This is already included as a suggestoin in the draft plan.
96	Tom Infusino	10/3/2012	MAC Plan Update Process	6) Provide a balanced evaluation of project impacts and benefits.	See comment 58.
97	Tom Infusino	10/3/2012	MAC Plan Update Process	7) Seek funding for current Capital Improvement Plans for AWA and CCWD.	See comment 65.
98	Tom Infusino	10/3/2012	MAC Plan Update Process	8) Include more projects that address adaptation to climate change.	See comment 90.
99	Tom Infusino	10/3/2012	MAC Plan Update Process	9) Commit to monitoring plan implementation.	See comment 60.
100	Colleen Platt, MyValleySprings.com	1/17/2013	CARWSP Report	The CARWSP project looks to be improved, at least from a Calaveras perspective. Total costs and CCWD's portion have gone down; Burson has been taken out of the areas to be served (they'll look to Jenny Lind for supply instead); the facility is sized to accomodate only approved development, and incorporates water conservation; and the Wallace area is in Phase 3 and will not proceed without outside funding, so as not to burden ratepayers.	Comment noted.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
101	Colleen Platt, MyValleySprings.com	1/12/2013	CARWSP Report	In section 2 Project Setting, Figure 1 Camanche Area, and in section 5.1 Areas to be Served, “the communities of Burson North and Burson South” are described. This is incorrect. There are no communities called Burson North and Burson South--they do not exist. There is only one unincorporated community called Burson. Please don’t invent communities that don’t exist or divide those that do. This was probably a misinterpretation of roads and maps. Please remove North and South, and just refer to “the community of Burson.	Burson North and Burson South are no longer referenced.
102	Colleen Platt, MyValleySprings.com	1/12/2013	CARWSP Report	The projection for a project demand of 400 existing and approved lots in the Wallace service area has no data or projects referenced to back the number up. We think these numbers are overstated, and question the accuracy of the numbers, the phrase “likely be built”, and what is meant by “over the coming years.” MyValleySprings.com has been tracking developments since 2005. We have obtained current County residential project lists, and we have posted recent County development maps on our website. We are not aware of “an additional 300 approved lots on which homes will likely be built over the coming years.” In fact, looking at project lists and maps, we can see only around 5-30 lots currently existing or approved on county maps within the Wallace service area. Much proposed development in the Wallace area has been denied, withdrawn, or has expired or gone through bankruptcy in recent years. See the attached two Calaveras County Planning Department maps “Subdivisions and Parcel Splits in the Valley Springs Area”, and “Subdivisions and Parcel Splits in Northwest Calaveras County.” These maps show approved, pending, denied, expired, and withdrawn subdivision and parcel maps in the Wallace area. If there is no other data available showing the basis for the claim	Additional lots are substantiated in attached map.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
103	Muriel Zeller	1/17/2013	CARWSP Report	I agree with Colleen that there are improvements, and I want to see Wallace have a viable water supply, but I do have some concerns: Conjunctive Use: Regarding CCWD, "even with a combination of water conservation and surface water supply to the community of Wallace, CCWD would be expected to periodically require additional supplies in years with very low Mokelumne River streamflows (estimated to be approximately 4 months out of every 48 months, based on modeling performed by EBMUD). By using surface water in lieu of groundwater in months when surface water is available, CCWD would allow the groundwater basin to recharge, improving supply and quality for use in years in which surface water is limited." Recent USGS studies indicate groundwater recharge is not occurring at any appreciable rate in the west county, where, in some areas, groundwater is estimated to be between 2,200 and 13,400 years old. CCWD is currently in the process of analyzing data to assess recharge potential in the west county. If there is information on the rate of recharge for these existing wells that are to be used in conjunction with the surface water, it should be included in this study.	Additional storage may be evaluated in the future.
104	Muriel Zeller	1/17/2013	CARWSP Report	"Use of surface supplies in lieu of groundwater supplies in 44 of every 48 months, on average, would be expected to allow the groundwater basin to adequately recharge, correcting some of the existing supply and quality deficiencies experienced by the system and enabling use during months when surface supply is unavailable. Alternative 3 is the only alternative that achieves this CSF (critical success factor) by providing a reliable supply for Wallace." Beyond what "would be expected," I didn't see any documentation that sufficient recharge would, in fact, occur to "correct supply and quality deficiencies" and supply the existing (100) and approved (400, not yet built) Wallace homes for the 4 months without surface water. In addition, "The groundwater in the areas surrounding CANS and CASS are problematic and would not allow for the extensive application of conjunctive use..." In short, I believe the extent of beneficial conjunctive use has been overstated in the Feasibility Study.	Comment noted. The attached maps of the Wallace area substantiate the additional 300 units.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
105	Muriel Zeller	1/17/2013	CARWSP Report	Coordination Among Multiple Water Agencies: "EBMUD plans to move forward with Phase 1. The portion of the project that would serve EBMUD's CANS and CASS areas is currently at 90% design and is expected to be constructed in 2013-2014. It should be noted that, while EBMUD currently plans to move forward with Phase 1, Phases 2 and 3 may not proceed if outside funding cannot be secured to offset implementation costs and minimize the burden to ratepayers in the Lake Camanche Village and Wallace areas." While AWA "intends" to move forward with Phase 2, a lack of funding may prohibit their intent. CCWD hasn't even "elected" to proceed with Phase 3. This project seems to be more about EBMUD than anyone else. There may be "coordination," but the primary beneficiary is EBMUD. Since this project is part of the MAC IRWMP, I think that needs to be clearly stated. As I heard at a CCWD board meeting, EBMUD is "in the driver's seat."	The cross-lake pipeline is being sized to convey water from the WTP to Camanche North Shore Recreation Area and Lake Camanche Village.
106	Muriel Zeller	1/17/2013	CARWSP Report	Land Use: In a county where the general plan coordinator is quoted in the newspaper as saying water supply issues will continue to "plague future development," and "We know water supply availability in parts of the county is being tapped down so far it's unsustainable," it is disingenuous to believe that any water supply project will not impact land use. As part of the MAC IRWMP, CARWSP is linked to various other water supply projects both inter- and intra-regionally.	Page 1-20 of the MAC Plan Update acknowledges that projects can have land use implications.
107	Katherine Evatt, Foothill Conservancy	1/17/2013	CARWSP Report	The way the study is written, it appears in the beginning that the project is intended to provide water to Burson. I did find where that was dropped later in the document, but you might rethink the structure/order of the info a bit.	Comment noted.
108	Katherine Evatt, Foothill Conservancy	1/17/2013	CARWSP Report	We are concerned about piping water to Wallace at a volume that would allow subdivision of the area to more-urban or suburban levels. We'd like to see water supply to that area capped at a level that would provide surface water equal to one EDU for each existing home or parcel. That could be done in the water right application or by appropriately sizing the plumbing, but in either case, it should be part of the project design and purpose.	Additional analysis regarding delivery to Wallace would be completed in the future. Comment will be forwarded to CCWD for consideration.

No.	Name	Date Submitted	Chapter	Comment	Recommended Reponse
109	Katherine Evatt, Foothill Conservancy	1/17/2013	CARWSP Report	We have similar concerns about Camanche Village. Further urban-surburban development of that rural area is not desirable from a land-use or conservation perspective. Providing county services to homes there isn't cost efficient; the homes are far from jobs, schools and shopping, which increases local residents' cost of living and GHG emissions from car trips; and there are sensitive biological resources in the area.	Comment will be forwarded to AWA for consideration.
110	Katherine Evatt, Foothill Conservancy	1/17/2013	CARWSP Report	We would therefore prefer to see the AWA combine a demand-reduction approach for Camanche Village with securing a viable water supply for the existing homes. As we envision that, the AWA phase of CARWSP would include: • Grant funds sufficient to provide one EDU of surface water to each of the built-upon lots at Camanche and a water system designed and water rights permit sufficient to provide that amount of water and no more. • Grant funds to purchase the remaining unbuilt lots at Camanche, thereby removing pressure on the agency to provide more water and eliminating the environmental impacts created by increasing water supply in a remote rural area. The AWA could put a conservation easement on the land, and then lease it for grazing (creating a small income stream for the agency), sell it to a nearby rancher, or donate it to the homeowners' association for common use of the members or to the Amador County Recreation Agency for use as a passive park.	Demand reduction measures are being implemented as part of CARWSP. Grant funding will be pursued in the future. Comment will be forwarded to AWA for consideration.


6 Lots
2006-108
2005-135
27 Lots
2003-110
3 Lots
2003-114
Wallace
BOLLE RD
PETROSS ST
WILLETT CT
WALLACE LAKE DR S
VERDIN CT
WALLACE LAKE DR
DANCIE DR
HAWKS LANDING CT
OLIVEIRA CT
Lots
4 Lots
2007-072
2006-020
2003-065
2 Lots
CRYSTAL DR
SLATE DR
LIMESTONE DR
LIMESTONE CT
QUARTZ DR
CAMANCHE PY S
2004-162
37 Lots
44 Lots
1991-521
Mokelumne Aqueduct
2 Lots
2004-022
2006-038
MEGAN LN
TORENO WY
BRANDY CT
2005-125
4 Lots
12
CREEK VIEW LN
HILLCREST DR
HASKELL ST
2004-095
2 Lots
2004-079
2 Lots
BENJUR CT
11 Lots
SAHARA WY RD
2 Lots
FERSEYNA WY
2 Lo
2005-13

Public and RPC Comments

www.MyValleySprings.com P.O. Box 1501
email: myvalleysprings@myvalleysprings.com Valley Springs, CA 95252

October 2, 2012

To: Lindsey Wilcox, RMC and Rob Alcott, UMRWA (lwilcox@rmcwater.com and robalcott@aol.com)
From: Colleen Platt, MyValleySprings.com
Re: Comments on the MAC-IRWMP Update Project List

Please accept the following comments and questions on the Mokelumne/ Amador/ Calaveras Integrated Regional Water Management Plan Update (MAC-IRWMP) and Project List. These comments are submitted by MyValleySprings.com, a Calaveras County-based community planning organization (www.MyValleySprings.com).

A. Project #23 (New Hogan Reservoir Pumping Project) and Project #24 (New Hogan Phase II Water Distribution Loop Project)

We have concerns about Calaveras County Water District's (CCWD) Project #23 (New Hogan Reservoir Pumping Project) and #24 (New Hogan Phase II Water Distribution Loop Project). From what we learned at the Sept. 24 MAC Plan Update Community Workshop, the Project Information Sheets from January, 2012 are still current and there have been no revisions or updates to CCWD project descriptions to-date. Our comments and questions are based on those January project descriptions.

In general, we feel Project #23 and Project #24 have not been adequately vetted. There has not been a thorough examination or evaluation of the projects by other agencies, local stakeholders, or the public. The project descriptions contain conflicting goals and statements with vague, sweeping, contradictory, and unsubstantiated claims. Both projects are intended to interconnect to each other and to the Camanche Regional Water Treatment Project (referred to as "Phase I"), but there is not enough information and clarity in the project descriptions to determine "technical feasibility." Previously-submitted public comments with criticisms and questions have not been addressed. Following are our comments and questions about the two Project Information Sheets and project descriptions that we feel should be addressed before accepting and moving these projects forward.

- "*Promote water conservation*", "*Use and Reuse Water More Efficiently*", "*Agriculture Water Use Efficiency*", and "*Urban Water Use Efficiency*" are all goals, priorities, and RMS strategies that CCWD claimed in order for the project to be eligible for IRWMP consideration. But how will water be conserved and used more efficiently when the New Hogan Pumping Project water delivery method is "gravity flow water conveyance" in "natural ephemeral streams that meander through the west county area**"? *Miles of open, meandering, overland water conveyance will lead to high water loss due to high evaporation rates and extensive leakage through open streambed channels.***

- "*Maintain and Improve Water Quality*" is a MAC Plan goal that was *not* claimed, and we understand why. **Overland delivery of water across the west county through open streambeds would likely *increase*, not decrease, instream erosion and sedimentation,** which is a concern for downstream water quality. Even if some measures are taken to prevent erosion (in the project description, "Portions of the streams may require lining to prevent scouring"), erosion and sedimentation will occur in streambeds.

- **"Portions of the streams may require lining" is not a habitat-friendly mitigation.** Damage to riparian streambed habitat by lining creek beds would occur, diminishing project claims for creating and restoring habitat (listed under "Resource Stewardship Benefits"). ***Lining streams would also prevent percolation into the streambed and into any aquifers below.***

- "*Conjunctive Management & Groundwater Storage*" and "*Groundwater/ Aquifer Remediation*" are project Resource Management Strategy claims, and "*This project proposes to mitigate overdraft conditions associated within the 30,000 acre portion of the Eastern San Joaquin Groundwater Basin underlying western Calaveras County*" and "*will stabilize groundwater elevations*" are Resource Stewardship Benefit claims, but the claims for benefits to groundwater appear to be without scientific basis or data to support. It is unclear how running water occasionally through ephemeral streams will recharge the aquifers in the west county. No scientific studies are included in Project Information to show the varied underground geology of the west county, to show if there are areas suitable for groundwater recharge, or to demonstrate that groundwater recharge through streams would actually occur in our complex foothill lands or have any effect on the Eastern San Joaquin Groundwater Basin. In fact, ***there is evidence to the contrary, pointing to the ineffectiveness of groundwater recharge from surface water in western Calaveras County***. On August 24, 2011, the initial results from two nested groundwater monitoring well sites were presented to the CCWD Board. Loren Metzger, a Hydrologist with USGS Water Resources Division, presented findings indicating that the age of the groundwater was between 2200 and 13,400 years old, and that recharge was very limited or very slow and not readily occurring in the west county. **What evidence is there that west county groundwater would be recharged with this pumping project?**

- "Water will be pumped over the northwest ridge of New Hogan Reservoir to a **30 acre-foot reservoir** to regulate flows to ...streams." **There are no details included about this reservoir—does it exist or will a new reservoir need to be constructed? Where is it to be located—on private development land or public agency land?** Is the reservoir tied into the US Army Corp of Engineers-Calaveras County Cosgrove Creek Flood Reduction feasibility project (as the project description mentions as a possibility)? If so, is the County of Calaveras and the ACOE aware of this and on board with the development of the New Hogan pumping project and reservoir?

- **What is the service area for the New Hogan water pumping project and the Water Distribution Loop--is the "service area" the entire west county area? What is the water to be used for—agriculture, groundwater recharge, residential growth, potable or non-potable raw water use, or all of the above?** *The project descriptions and service areas are too broad, contradictory, and unclear.* The project description for the pumping project first says "a pumping plant and water conveyance facilities are proposed to deliver New Hogan Reservoir water to the communities", and lists six different, widely dispersed residential communities in the Camanche/Valley Springs area. Later in the paragraph it states "The water delivered to the service area will be used for

agriculture and conjunctive use" and in the following paragraph, "The project will allow...greater capacity to meet growing water supply needs for agriculture and growth in the west county area." In the Water Distribution Loop project description it proposes interconnecting with both the potable water system serving Valley Springs/Rancho and the New Hogan Pumping Project "that proposes to provide raw water to the western Calaveras County area to stabilize dropping groundwater levels" and then it talks about delivering potable and raw water to western Calaveras users. ***How can a water distribution loop interconnect with both potable and non-potable water—don't raw and potable water need to be in separate delivery systems?*** *Where are these two water projects proposing surface water be taken—what is the destination? What is the purpose?*

- **Has it been adequately demonstrated that there is a need and demand for more water for irrigated agriculture and for residential growth in western Calaveras?** The *June 2011 report cited for irrigated agriculture development shows that* ***because of significant development and parcelization*** *since the mid-70s* ***there are only 3,416 acres in the Valley Springs area of 'Lands Meeting Criteria' of 'Suitability for Agricultural Production'*** *(pg. 10). The report also states "there are a number of questions that need to be answered and items that need to be verified*" which include "This initial analysis utilizes a dataset of information that is 30 to 45 years old and has not been verified", "A determination needs to be made to estimate how much agriculture could pay for water and infrastructure, while still yielding a reasonable profit to the grower to entice agricultural development", and "Evaluate the community support for developing agriculture. It is anticipated that some opposition to agriculture would be present, either because of changes to the landscape or the perception that urban areas would subsidize agriculture." ***There are no reports or studies attached showing a need for more water for residential growth in western Calaveras***. In fact, CCWD Jenny Lind WTP and Hogan Dam water supply studies assure local residents that they have plenty of water available now and in the future.

- The #24 **Camanche-New Hogan Ph. II Water Distribution Loop Project "is in conceptual/pre-design phase with continuing work necessary to complete the project description."** We agree! The project description is so preliminary it reads more like "pie-in-the-sky"*: "The Phase II water distribution intertie loop between the Mokelumne and Calaveras systems will provide greater flexibility and reliability in delivering potable and raw water to the western Calaveras County users, mitigate groundwater overdraft in Eastern San Joaquin Groundwater Sub-Basin, and provide the opportunity to implement conjunctive."* And supposedly this will also provide "Water Supply Benefits of New Supply: 28,000 AF/YR." How all that's going to happen for only $3 million is not clear (the construction cost estimate of $3 million includes only an "initial intertie" for one portion of the project). "Additional conveyance facilities...may add to this cost." What is the actual project going to be, what are actual costs, and are these costs economically feasible when added to Ph. I and Hogan Pumping project costs (which are linked)?

- Both #23 & #24 project descriptions suggest *integrating and linking* New Hogan Reservoir pumping operations and the Camanche-New Hogan Phase II Water Distribution Loop Project with the Mokelumne River Forum's effort to develop an Inter-Regional Conjuntive Use Program, San Joaquin County's MORE water project, and the South Shore Camanche Regional Water Treatment Plant. ***MyValleySprings.com is strongly opposed to the MORE water project and any linkage to it from New Hogan Reservoir or the Water Loop Project.*** The MORE water project proposes to build a new

200,000 acre-foot Duck Creek Dam and Reservoir by condemnation and inundation of thousands of acres of protected conservation easement ranch lands in eastern San Joaquin County. We do not support the MORE water project, and ***we do not support diverting New Hogan Reservoir storage water for the purpose of supplying San Joaquin County's "Beneficial Use Area" or recharging the aquifer in San Joaquin County***.

As the above questions show, *ambiguous and grandiose projects and descriptions raise many* ***potential obstacles to implementation***. The public is almost entirely unaware of these current project proposals. Given the large geographic area, scope and ambitious goals, potential environmental impacts, potential impacts to agriculture and residential growth, the history of water development in Calaveras, and the high costs of these proposals, ***Project #23 and #24 are likely to be highly controversial when the public becomes aware of them.*** Previous proposals for development of irrigated agricultural in the west county generated controversy and resistance; a bond measure was defeated at the polls in 1974. Before IRWMP Policy 4 Goal can be met (prioritizing projects with the best likelihood of being completed), these two projects need public outreach and buy-in, need more detail and data, and need to work with stakeholders and agencies in order to "Focus on Areas of Common Ground and Avoid Prolonged Conflict."

B. CARWSP Project #26 (Camanche Area Regional Water Supply Project)

MyValleySprings.com also is concerned about CARWSP Project #26 (Camanche Area Regional Water Supply Project), although this project appears to be still in the planning stage with various agencies. We question inclusion of the Burson area ("Burson North" and "Burson South", as was shown on the "Potential Areas to be Served" map). The Burson area has a very small community center area and consists mostly of large-lot parcels served by wells. It is not an "area approved for development" that we're aware of. The scope, objectives, capacity, and potential areas to be served by CARWSP are unclear at this time. We will comment later as more information becomes available.

We would like to keep informed about the above projects. Please add our organization to email noticing lists for meetings and information on the Camanche Area Regional Water Supply Project Plan and the MAC-IRWMP Plan Update. Thank you for consideration of our comments.

Respectfully,

Colleen Platt, Secretary
cplatt1@comcast.net

MyValleySprings.com, P. O. Box 1501, Valley Springs, CA 95252
email: myvalleysprings@myvalleysprings.com

Cc: Tom Infusino, Calaveras Planning Coaltion
Muriel Zeller, Calaveras Planning Coalition
Lew & Kathy Mayhew, Keep It Rural Calaveras
Pete Bell, Foothill Conservancy

Lindsey Wilcox

From: Colleen Platt [cplatt1@comcast.net]
Sent: Friday, October 05, 2012 11:14 AM
To: Lindsey Wilcox
Cc: Tom Infusino; Muriel Zeller; robalcott@aol.com
Subject: Re: MAC-IRWMP Update comments from MVS.com

Follow Up Flag: Follow up
Flag Status: Flagged

Lindsey,

Please accept this additional comment/ Addendum to our previously-submitted comment letter for an item I forgot to include. Thank you very much!

Colleen Platt
MyValleySprings.com
cplatt1@comcast.net

Addendum to comments from MyValleySprings.com:

We forgot to include in our previous letter our observation of incorrect Capital Costs in Chapter 4. Implementing Projects and Programs, in the spreadsheets in Appendix A and Appendix B for Project #23 New Hogan Reservoir Pumping Project. Undoubtedly these are typos, but there is a significant difference between $22,000 and $22,000,000. According to the Project Information sheets, the correct project Capital Cost is **$22,000,000**, not $22,000.

(see text below from spreadsheets)

Appendix A- Project Summary and Evaluation
(spreadsheet, pg. 28 of 34 of pdf)
Tier 1 - Screening
Step 2 - Resource Management Strategies Incorporated
(Display Includes Capital Costs, Status, and Overall Result)
23 CCWD New Hogan Reservoir Pumping Project $22,000

Appendix B – PROJECT TYPE AND
FINANCING SUMMARY
(spreadsheet, “pg. 30”; 34 of 34 of pdf)
CCWD New Hogan Reservoir Pumping Project

Potable Water Supply Project – Conveyance Facilities and Storage Operations $22,000 $24,812 TBD

----- Original Message -----
From: Lindsey Wilcox
To: Colleen Platt
Sent: Wednesday, October 03, 2012 9:20 AM
Subject: RE: MAC-IRWMP Update comments from MVS.com

Thank you, Colleen!

Lindsey Wilcox
Project Engineer

Phone: 925-627-4100
lwilcox@rmcwater.com

From: Colleen Platt [mailto:cplatt1@comcast.net]
Sent: Tuesday, October 02, 2012 9:33 PM
To: robalcott@aol.com; Lindsey Wilcox
Cc: pete@mokeriver.com; Tom Infusino; Muriel Zeller
Subject: MAC-IRWMP Update comments from MVS.com

To: Lindsey Wilcox, RMC and Rob Alcott, UMRWA
From: Colleen Platt, MyValleySprings.com
Re: Comments on the MAC-IRWMP Update Project List

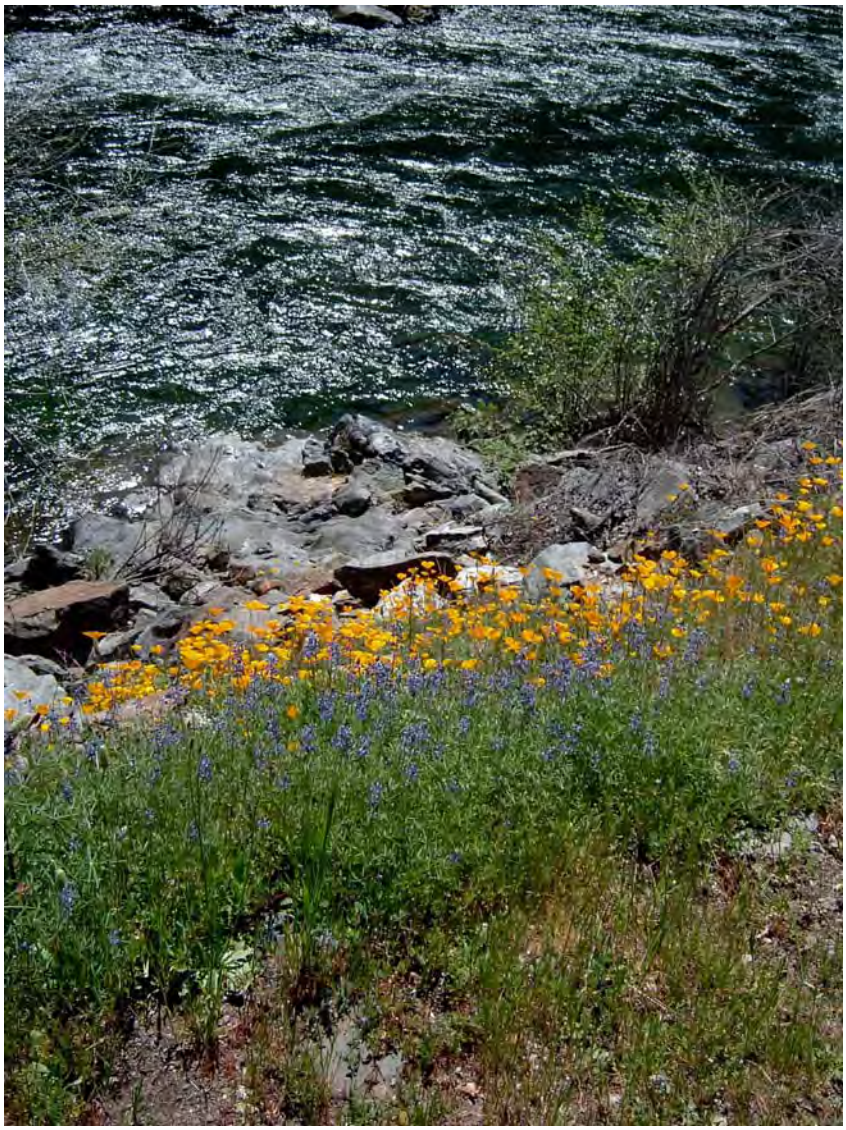
Please accept the attached comments on the Mokelumne/ Amador/ Calaveras Integrated Regional Water Management Plan Update (MAC-IRWMP) and Project List. These comments are submitted by MyValleySprings.com, a Calaveras County-based community planning organization (www.MyValleySprings.com).

Thank you.

Regards,

Colleen Platt
MyValleySprings.com
cplatt1@comcast.net

Comments on the Draft MAC IRWMP Update



Prepared by

Thomas P. Infusino

For

The Calaveras Planning Coalition

October 17, 2012

Introduction: We must correct serious shortcomings in the Draft MAC IRWMP

My name is Tom Infusino, and I am submitting these comments on behalf of the Calaveras Planning Coalition (CPC). I have been an active member of the Regional Participants Committee (RPC), and can speak from personal experience regarding RPC meetings and the planning process. I have a degree in planning from UC Davis, and a law degree from University of the Pacific. I have been involved in resource planning efforts in the Sierra since 1991.

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.

We have reviewed the IRWM Guidelines, the draft MAC IRWMP sections provided for public review (Chapters 1 through 4), and the additional MAC IRWMP sections provided at the September 24 RPC meeting (Chapter 5). **In general, we feel that, for the success of the MAC IRWMP, we must correct serious shortcomings of the Draft MAC IRWMP before the document gets critical review by the California Department of Water Resources during the 2014 grant funding cycle.**

We understand the need for UMRWA to timely approve some MAC IRWMP in January 2013. However, we feel that it is equally essential to continue to improve the plan in 2013 until the plan is both consistent with the IRWMP Guidelines, and competitive with the IRWMPs from other regions. These improvements are needed to meet UMWRA's goal for the IRWMP process: "Develop an updated MAC Plan which addresses a broad range of water-related and environmental stewardship needs through effective stakeholder participation, and is comprehensive and competitive with other plans."

Many people have put a lot of time into getting the plan to this point. It would be a shame to get 75% of the way to a complete plan, and then stop the work just before the plan meets the guidelines and becomes competitive. If you stop now, you will have only yourselves to blame when DWR considers the severity of the plan's ongoing shortcomings, and disqualifies the plan or its projects from grant competition. When gap funding for a quarter of a billion dollars of infrastructure projects region-wide is at stake, it would be penny wise and pound foolish to bring this planning effort to a premature climax.

Below we present our comments on the Draft MAC IRWMP. We review each of the 16 topical areas required in an IRWMP. We identify process, text, or graphic provisions where the IRWMP Guidelines have not been met. We make suggestions for rectifying these plan deficiencies. Some of these deficiencies can be corrected prior to plan approval in January 2013, while others will take longer to correct.

Though we also note aspects of the plan that have excelled in meeting the IRWM Guidelines, we do not believe that the merits of these sections make up for the deficiencies in other sections.

Even though we did not carefully review the text and graphics of the plan for clerical errors, we do note a few that became obvious to us.

We also feel that the text of the plan presents a one-sided and too rosy a picture of the actual planning process. Too often it speaks to what could have happened rather than what did happen. Examples are noted below. In general, the plan needs to finesse issues less often, and tell the whole truth more often.

I. MAC IRWMP Governance

A) Standards.

The governance section of an IRWMP identifies which local, state, and federal officials; and which other people, participated in preparing the plan. It explains the structure of the committees and decisionmaking bodies that prepared the plan. It explains how the form of governance ensured public outreach, effective decisionmaking, a balanced opportunity to participate, effective communication, long-term implementation of the plan, good coordination with neighboring IRWM planning efforts, a collaborative process to establish objectives, a procedure for making interim changes, and a means for updating the plan. (2010 IRWM Guidelines, pp. 19-20, 36-39.)

A key component of the governance section is the explanation of the public involvement process. The process should seek to include all interested parties in plan development including: water purveyors, wastewater agencies, flood control agencies, city and county governments, special district, electrical utilities, Native American tribes, self-supplied water users, environmental

stewardship organizations, community organizations, tax-payer groups, recreational interests, industry organizations, state and federal agencies, and disadvantaged communities.

B) Challenge: Improve public outreach.

Governance was one of the topics for which the 2006 MAC IRWMP did not meet current IRWM Guidelines. A key reason for conducting the update was to fix the governance section of the plan. DWR is likely to scrutinize this topic, and is unlikely to miss our errors. Therefore, we should make a very strong effort to fix this known deficiency of the 2006 MAC IRWMP.

The Governance section, describes the "intended" purpose of the governance structure and what it was "expected" to achieve. (Draft MAC IRWMP, Chapter 2, p. 3.) It does not describe what actually happened. The Governance section describes "anticipated participants", not who actually shows up and participates on the RPC. (Draft MAC IRWMP, Chapter 2, p. 4.) The Governance section generally describes the public participation for which the MAC IRWMP "strives," but it does not give the details of how short the public review on the draft plan was (September 14 – October 3), and that only 4 or 5 members of the public attended the September 24 public workshop. (Draft IRWMP, Chapter 2, p. 6.) By way of contrast, when EBMUD proposed to raise the dam on Pardee Reservoir in its 2040 WSMP, they had no problem getting over 100 people to attend their public comment meetings in Amador and Calaveras counties. (Exhibit 1, Articles on EBMUD Hearings.) The discussion of integration claims that the governance structure "fosters integration," but it does not report that the "diverse group of participants" did not arrive. (Draft IRWMP, Chapter 2, p. l0.) The final plan must do that.

Instead, Section 2.2.5, Benefits of Governance, lists benefits that did not actually materialize. The "three-tiered structure" did not provide balance among stakeholders or result in a decisionmaking process that was "fair." The water agencies had complete control, and everybody in the room knew it. The public outreach program did not result in "the wide participation by stakeholders and RPC members from all relevant areas of water resources management in the region." (Draft MAC IRWMP, Chapter 2, p. 7.) This is an example of the Draft MAC IRWMP presenting, "a one-sided and too rosy a picture of the actual planning process."

The problem is that lengthy commitment to participate on the RPC (August 2011 to January 2013), during weekday working hours, drove stakeholders away from the planning process. The only other opportunity to participate is through the very limited public comment process. **There need to be more opportunities to participate and to provide input into the planning process between the two poles of RPC membership and public commenter.**

Currently, our RPC has limited regular participation and limited intermittent participation. The water agencies (AWA, CCWD, EBMUD, and JVID), the Foothill Conservancy, the CPC, and

the City of Plymouth attend regularly. We have had occasional visits from the City of Jackson, and the Forest Service. Trout Unlimited came initially and withdrew. The City of Ione has attended one meeting.

Unfortunately, a lot of important parties did not attend the RPC meetings, or dropped out along the way. Wastewater Agency ARSA did not attend, nor did the City of Sutter Creek that depends on ARSA for wastewater treatment. Both these entities have proposed wastewater treatment solutions that are not necessarily consistent with the regional plant proposed by AWA. The County Health Departments, responsible for regulating septic systems and small potable water systems, did not attend. The electrical utility, PG&E did not participate, even though expansion of one of its facilities (Lower Bear River Reservoir) is a project in the plan. Special Districts, like the Fire Districts who depend on the upgraded pressurized water systems under consideration for funding, did not participate. The Sanitation Districts from Mokelumne Hill and San Andreas, potential key partners in water recycling, did not attend. BLM did not attend, though they are a major landowner with jurisdiction over abandoned mines and their drainage remediation, and are actively promoting recreation on the Mokelumne River. Native American Tribes, a key constituent that the IRWMP is supposed to consult and serve, did not participate. Taxpayer and ratepayer groups did not participate in the RPC, but one did provide public comments on the projects. Though one realtor did sign up to participate, she did not subsequently attend, even though she was the only representative from the business and industrial sector.

Unless the RPC creates more opportunities to get input from these very important parties, the MAC IRWMP list of participants will appear too narrow, and may harm our chances of getting funding in 2014.

C) Recommendations

Include in the final plan the attendance sheets for the RPC meetings and the public workshops, so that the actual levels of stakeholder and public participation are reflected. Balance the half-truths in Chapter 2 about what was intended and strived for with the actual results of what was achieved.

Over the course of next year, hold a series of individual meetings to invite key missing stakeholder groups to put their two cents worth in on the plan (i.e. city and county governments planning and health department staff, school districts, Calaveras COG & ACTC, electrical utilities, Native American tribes, self-supplied water users, community organizations, tax-payer and ratepayer groups, recreational interests, industry organizations, state and federal agencies, and disadvantaged communities.). For example, on one day you could have a meeting with City and County planning staff, COG staff, ACTC staff, School Districts.

If this does not work, delegate to RPC volunteers the responsibility of meetings one-on-one with additional stakeholder groups or their representatives. Provide RPC volunteers with questions to ask and materials to share.

Note the suggestions of these new stakeholders. If project ideas result from these meetings, encourage participants to sponsor or cosponsor a project proposal for addition to the plan. Prior to the 2014 grant package submittal, add notes on the new stakeholders' suggestions in the implementation section, and amend the plan as needed based upon their suggestions. It is not too late for the MAC IRWMP Update to do a more comprehensive job of outreach to important participants. If we fail to do so, we will only have ourselves to blame should DWR find this flaw fatal to our MAC IRWMP.

D) Challenge: No RPC policy on information collection, review, and inclusion in the plan.

Right now, it's the project applicant's information or the highway. Unless the NGOs and the public can convince the agency to voluntarily change the description of their project, or their self-reported ranking on their projects, the MAC IRWMP will accepts the agency's version of the facts without question, even when there is ample evidence to the contrary in public comments. Telling the NGOs that all they have to do is convince the water agencies to downgrade their self-assessment of their proposed projects, is like telling a slave that all he has to do to be free is convince his master to set him free.

For example, comments by the Ratepayer Protection Alliance (RPA), and adopted by one RPC member as his own, indicate that 18 of the Amador Water Agency's (AWA) 20 project have a high risk of not being implemented (i.e. rated 7 or greater on a scale of 1 to 10). (Exhibit 2: RPA Comments May 2012.) One of the RPA's key concerns is the equitable distribution of project costs and benefits among existing ratepayers and future customers. This concern is verified by AWA failure to demonstrate an equitable distribution of benefits for 18 of their first 20 projects. (Draft MAC IRWMP, Chapter 4, Appendix A, Table Tier 1-Screening, Step 1 - Reflect Goals and Statewide Priorities.) The RPA can make the risk assessment with credibility, because it knows its member base, and it has already participated in three successful Proposition 218 protests against AWA rate increases. (Exhibit 3: RPA 218 Protest Results.) Such protests can severely hamper AWA's ability to implement projects.

Despite this important information submitted by an RPC member, the AWA self-assessment of the probability of implementation rates only 2 of its first 20 projects as having a high risk of not being implementation. (Draft MAC IRWMP, Chapter 4, Appendix A, Table Tier 2 - Evaluation, Step 1 –Apply Evaluation Criteria) Furthermore, it is only that AWA assessment that is presented in the spread sheet evaluating projects. The RPA comments, though arguably of equal or greater value, does not yet appear anywhere in the Draft MAC IRWMP. This does not reflect equal power or voice for RPC participants. It erodes claims of collaboration.

For another example, RPC member the Foothill Conservancy assessed the projects on the degree to which they were the best to achieve the purpose, from an economic, environmental, and societal perspective: the so called triple bottom line. (Exhibit 4: Foothill Conservancy Comments 5/30/ 12.) The Foothill Conservancy expressed serious concerns about whether 5 of the AWA's first 19 projects (i.e. Numbers 7, 10, 11, 12, 13) were actually the best to achieve the purpose. Nevertheless, the AWA scored all of those projects high for that criterion. (Draft MAC IRWMP, Chapter 4, Appendix a, Table Tier 2 – Evaluation, Step 1, Apply Evaluation Criteria.) Yet it is only the AWA assessment that appears in anywhere in the Draft MAC IRWMP. This does not reflect equal power or voice for RPC participants. It erodes claims of collaboration.

For another example, when it comes to supply and demand data, unless the NGO's can convince the agencies to change their data voluntarily, the consultants have said that they will accept only the agency version, regardless of ample evidence to the contrary. (See comments on Regional Description, below.) This does not reflect equal power or voice for RPC participants. It erodes claims of collaboration.

Furthermore, we are near the end of the MAC Update process, and there is still no clear guidance on how non-agency stakeholders or the public will be able to get their information into the plan, if at all. Unlike the other draft sections of the plan that the RPC got to review, there is no section title, no outline for the section, no guidance for submitting information in any particular format, nothing. There is a deadline for public comment, but no clear explanation of how that comment information will be processed, used, or preserved in the plan. This does not reflect a process that provides for equal power or voice for RPC participants. It erodes claims of collaboration. It is not exemplary of a form of governance that ensures public outreach and a balanced opportunity to participate.

Finally, even where the public and the agencies agree that there are data gaps, we have not specifically identified the need for those studies as part of a project, or asked for funds to fill those gaps. A major data gap is that, although the AWA has proposed over 230 million dollars in projects, AWA has no capital improvement plan that identifies, phases, prioritizes, or finances these projects, or has the approval of the AWA Board and its ratepayers. Yet, no proposed AWA project includes the funding and preparation of such a strategic capital improvement plan. Also, although CCWD proposes to "restore" ephemeral streams by using them as conduits to deliver, the project does not specifically call for the study of the previous natural hydrograph to guide this restoration. (Project 23 – New Hogan Reservoir Pumping Project.) In addition, although there is an admitted need for additional studies to clarify CCWD's future agricultural water demand, no proposed CCWD project includes the funding for these studies. (See Regional Description comments below.)

Thus, incomplete agency information may just languish as such, and remain a shaky and controversial basis for seeking funding. This does not reflect equal power or voice for RPC

participants. It erodes claims of collaboration. It perpetuates weaknesses in the data that instead should better reflect the merits of the projects.

E) Recommendations

We recommend that as an RPC we decide:

1) To include the public comments in the plan verbatim.

2) To review and respond to the public comments.

3) To consider making changes in the draft document based upon public comments on the draft.

4) To delegate to a committee the preparation of new guidance for the way that information will be received, reviewed, and accepted into the plan in future amendments and updates.

F) Challenge: To Improve the balance of power to promote collaboration.

The fact that anything not resolved by the RPC goes to agency-only groups for review and recommendation to UMRWA removes any need or effort by the agencies to discuss or negotiate the controversial issues, and provides a strong disincentive for NGO's to participate. This disincentive is only reinforced by the fact that non-applicant information is neither considered in project review, nor disclosed in the IRWMP, without the consent of the applicants. The agencies dominate the RPC, the Review Committee, and UMRWA. There is no standard of review by those bodies, no procedures for appeals to those bodies, and no mechanism for accountability if they abuse their discretion. This is not providing RPC participants with and equal voice or power. It is not promoting public participation in the process. It is not working out issues of concern in a collaborative way. It is not promoting long-term implementation of the plan.

When I raised this issue at the RPC meeting on September 24, the facilitator quipped that he was O.K. if I wanted to give up some of my power. Another RPC member questioned that the guidelines called for equal power and equal voice for all members. So I read from the guidelines, "Equal distribution of power and voice among stakeholders." (2010 IRWM Guidelines, p. 38.) Then he asked if I was also willing to share equally in financial responsibility with the other RPC stakeholders. So I again read from the guidelines, "[T]he opportunity to participate, regardless of their ability to contribute financially to the IRWM Plan." (*Ibid*.) His response was that the Guidelines are not etched in stone, and the troublesome ones can be changed. Clearly we have a long way to go on the road toward collaboration.

G) Recommendations:

RPC consultant Allyson Watson has proposed the following (not mutually exclusive) means of improving governance:

Alternative 1: Eliminate Board Advisory Committee Role and Communicate Directly with Board:

Currently, if consensus cannot be reached at the RPC level, the matter is elevated to the Board Advisory Committee for resolution. If the Board Advisory Committee does not resolve the issue, it is then elevated to the UMRWA Board for resolution. Under this alternative, if consensus is not reached at the RPC level, the UMRWA Executive Officer would be obligated to work with the affected RPC members to properly account for their concerns and recommendations, and incorporate a description of the matter into the agenda report for the next UMRWA Board meeting. The affected RPC members would be provided with the opportunity to personally present the matter to the Board in conjunction with their deliberations. The Board Advisory Committee would not have a role in resolving RPC issues.

- **Alternative 2: Designate Subcommittee of the Full RPC to Resolve Disagreements:**

  Currently, if consensus cannot be reached at the RPC level, the matter is elevated to the Board Advisory Committee for resolution. If the Board Advisory Committee does not resolve the issue, it is then elevated to the UMRWA Board for resolution. Under this alternative, all RPC matters would be resolved at the RPC level. To do so, a subset of the RPC representing balanced interests would vote to resolve the conflict. The representation of the subcommittee would need to be determined such that the RPC felt it was reasonably representative of the viewpoints on the committee (preferably also an odd #). It could include, for example, one city/county official, one water/wastewater agency rep, one environmental community rep, one resource agency rep, etc. The RPC members affected would be provided with the opportunity to personally present the matter to the subcommittee, who would decide, either by consensus or vote, how to resolve the issue. Issues would be decided by this group rather than having issues resolved outside the RPC.

- **Alternative 3: Request Re-Consideration by Board (this would probably be in conjunction Alt 1, 2 or both):**

  Currently, UMRWA has final approval responsibility for Plan products. Under this alternative, whenever the UMRWA Board is considering taking action that differs from recommendations of the RPC, the RPC will be notified in advance, and RPC members will be afforded the opportunity to participate in and provide input to the Board's deliberations.

The Foothill Conservancy has also suggested that planning agencies, tribal representatives, DAC representatives, conservation groups, and others stakeholders should be allowed to serve at any level of the governance structure, which would mean that UMRWA could not be the final decision body. There might need to be some agreement about principles to which all participants would have to adhere so people can't just jump in to kill and project and jump out. All decisions

could be made by consensus of the parties. There could be a memorandum of understanding developed, that all parties would have to sign, describing both how the final decision-making body would function, and the details their roles and responsibilities.

If those recommendations do not resolve the governance problems, the RPC could delegate to a balanced committee the preparation of new guidance for MAC IRWMP governance.

H) Challenge: to provide examples of circumstances that will trigger plan amendment.

Currently, the Governance section states, "In the event that interim and/or formal changes are needed, the Board would direct the RPC to oversee completion and incorporation of changes." (Draft MAC IRWMP, Chapter 2, p. 7.) When "needed" is a very vague standard. Please include in the final plan some examples of circumstances that would trigger a plan amendment. For example:

A plan change will be made to incorporate the results of plan monitoring.

A plan change will be made when project-specific monitoring indicates that a project will not achieve one of its asserted benefits, or will exceed its reported costs.

A plan change will be made when the plan or a project is modified through adaptive management.

A plan change will be made when heretofore missing information becomes available (e.g. input from missing stakeholders, results of modifying the governance structure, updated information about the regional description, new project applications, project-related operation and maintenance costs, or new information from updated local water plans or land use plans.)

A plan change will be made when needed to address new IRWM Guidelines.

2) Region Description

A) Standard

The Region Description in the plan describes the watersheds and water systems in the region, the internal boundaries of the region, the water supply and demand for the 20-year planning horizon, the current and expected water quality, the social and cultural makeup of the region, major water related objectives and conflicts, an explanation of how the IRWMP regional boundary was determined to be appropriate for the area, and the working relationship with neighboring IRWMP efforts. The intent of the Region Description is to identify the region by the water systems being managed and the common water issues of concern. By identifying the water systems and issues of concern to people, those working on the IRWMP can try to include a sufficient variety of interested parties in the planning process. (2010 IRWM Guidelines, pp. 20-21, 39-41.)

B) Challenge: To get the regional details right.

The Region Description is covered in Chapter 1 of the Draft MAC IRWMP.

Unfortunately, it appears that the memo providing the crosswalk between the sections in the MAC IRWMP and the IRWM standards they cover was left out of the draft IRWMP made available to the public on the UMRWA website. (See Watson, Section Update Overview, 9/26/11) This may have made it hard for people to comment on the Draft IRWMP. It would have made it hard for me, and I have been working with the document for a year. I am sure it would create a hardship to DWR when it comes time for them to review the plan. We do not want DWR to inadvertently reject the plan simply because the reviewer could not find the section of the plan that covered the IRWM standard.

Please standardize page numbers among the IRWMP chapters. The pagination in Chapter 1 is 1-1, 1-2, etc. The pagination in subsequent chapters is Page 1, Page 2, etc.

On page 1-2 of the section, change "Sierra Nevado" to "Sierra Nevada".

On page 1-15 of this section add to Table 1-3 the San Andreas Sanitation District.

On page 1-18, please change the name from the "Electra Run" to the "Electra and Middle Bar Runs". Also, delete the phrase "and above Highway 49." To the list of other recreational activities, please include "wading, wildflower viewing, gold panning, and spiritual rejuvenation."

On page 1-21, there are statements that the IRWMP is not intended to drive the General Plan Update process or to influence growth or growth patterns in Amador and Calaveras Counties. Again, rather than state the intent, state the actual facts.

In Amador County, the Gravity Supply Line's Mitigated Negative Declaration specifically indicated that it will facilitate the conversion over 5000 five-acre lots not served by public water to smaller lots served by public water, in the forested upcountry lands in the CAWP service area. (Exhibit 5, GSL MND, p. 71.) In addition, AWA is developing a broader service area map for the upcountry region, to help finance the GSL. (Exhibit 6, AWA CFD 2 Map.) The potential impacts of the GSL on upcountry land use patterns were raised during project review. (Exhibit 7 – Foothill Conservancy Comments on GSL 12-28-09.) Thus, regardless of intent, the GSL project included in the IRWMP will influence growth patterns in Amador County.

Similarly, CCWD's two New Hogan projects in the IRWMP (Projects 23 & 24) will increase the amount and distribution of water to western Calaveras County. The Valley Springs area currently has competing proposed community plans, with varying degrees of community-centered growth and sprawl. (Exhibits 8 & 9, Draft Valley Springs Community Plans.) Providing more water and a broader distribution to open space lands can facilitate development of green open space, as opposed to infill. Thus, the New Hogan Projects will influence land use patterns in Calaveras County, regardless of the "intent" of the MAC IRWMP.

On page 1-21, the IRWMP indicates that the MAC IRWMP Region "is home to approximately 130,000 people." Where does that very high estimate come from? It is not consistent with the County and City population data provided on page 1-13. The IRWMP goes on to state that the population density is 2,000 people per square mile, suggesting that the MAC Region is only 65 square miles (130,000/2,000), or 416,000 acres (65x640). Amador County alone is 384,000 acres. (Exhibit 10, Amador County, General Plan Update, Classification System and Alternatives Workbook, p. 38.) The MAC Region includes about 2/3 of Calaveras County, or another approximately 435,000 acres. (Exhibit 11, Calaveras County, General Plan Update Alternatives Report, p. 12) The population and population density data on page 1-21 of the Draft MAC IRWMP need to be corrected. Of course, I am only an NGO representative to the RPC, so you will need the permission of the government RPC members before you correct their population and population density data.

On page 1-23, the list of DACs in the text includes Sutter Creek two times. Please delete one of these listings. Also, River Pines is not on that list. Please add it.

Are the listed unincorporated town DACs along Highway 4 (Murphys, Avery, and Dorrington) part of the MAC IRWMP or Part of the Stan-T IRWMP? None of these towns or their special districts participated in the MAC IRWMP Update. Did they participate in the Stan-T IRWMP? They should not fall through the cracks, since Murphy's Sanitation District and their PUD need all the help they can get.

Page 1-27 states, "The regional water supplies and demands included in this section are based on the best available information and projections." Again this is another example of the IRWMP's "one-sided and too rosy a picture of the actual planning process."

The AWA estimate is based upon "the projected growth described in the local general plans." What does that mean? Some of the growth estimates in the local government general plans are not based upon current or reliable data. The Sutter Creek general plan dates from 1994. The Amador County General Plan was approved in 1974. Is that the growth data used by AWA to estimate future demand? Since then, those local governments have updated their Housing Elements with more current growth data. Is that the data used by AWA? Mysteriously, the AWA increased its estimate of Amador County's average annual growth rate from less than 1% in the old UWMP to 1.8% in the new UWMP. Although the Foothill Conservancy asked for some explanation during the UWMP update in 2011, none was forthcoming. (Exhibit 12, Foothill Conservancy on AWA UWMP.) Unfortunately, there was no opportunity for the RPC to discuss those issues before accepting the demand projections from AWA.

On page 1-31, the demand figures for CCWD include a growth in raw water demand for the Valley Springs Area of nearly 16,000 acre-feet per year by 2035. This is based upon a study that identified the need for over 100,000 acre-feet of water per year to irrigate 29,000 acres of agricultural land in Calaveras County. (Exhibit 13, CCWD Irrigation Study, p. 10.)

However, that study recognizes huge deficiencies in the data, not the least of which is that parcelization and development in the rapidly growing Valley Springs area over the last 40 years has gobbled up much of the acreage previously considered suitable for irrigation. The study also generally cautions that "this analysis utilizes a data set that is 30 to 45 years old. This information needs to be verified and 'ground truthed' before committing to plans for agricultural development." (Exhibit 13, CCWD Irrigation Study, pp. 10 & 12.)

The 12-page study includes more than a page-long list of 9 essential future follow-up studies:

RECOMMENDED NEXT STEPS

If the District is interested in further pursuing the potential for agricultural development in the western portion of the County, there are a number of questions that need to be answered and items that need to be verified. The following next steps are recommended to help the District decide whether to pursue agricultural development and to what degree:

1) This initial analysis utilizes a dataset of information that is 30 to 45 years old and has not been verified. At this time it is unknown how extensive the original field work was in developing the dataset and it is unknown how things have changed in the area. It is recommended that this initial analysis and subsequent results be reviewed with the County Farm Advisors Office and local NRCS office to ascertain whether local knowledge could refine the analysis. The data needs to be field verified or "ground truthed", but most of the land is privately owned and it may be difficult to obtain permission to access the land.

2) While many soil conditions can often be mitigated through mechanical means, the deeper the soils the better. At this time it is not known what a shallow soil depth in the Soil-Vegetation dataset actually means, but agricultural development will be much more economically attractive if a grower does not have to spend significant capital dollars on deep ripping or other soil modifications. The NRCS is in the middle of their soil survey and it is our understanding that they cannot publicly release any information until the soil survey is published in a few years, but it may be possible to have them verify some of these preliminary findings by comparing soil borings that they have available. They may also be able to generally tell us more information about certain areas such as the Salt Springs area.

3) Discussions with local landowners would be helpful to gain their insight on the potential for developing irrigated agriculture in the area. It is interesting to note that the water supply from the private Salt Springs Reservoir apparently is delivered to agricultural land outside Calaveras County rather than used on the land adjacent to or immediately downstream of the reservoir. It would be helpful to learn more about this area and how that water supply was developed.

4) Gather information on land prices and lease rates in the area.

5) Further evaluate the possible crop mix to identify crops that would likely be limited to small boutique acreage versus larger production acreage and the factors that would influence that decision, such as contracts and processing facilities. It may also be possible to research possible effects of the apparent impact of global warming on future cropping patterns Almonds moving onto a

little higher ground may be viable to obtain adequate chilling hours with the apparent impact of global warming.

6) Evaluate the economics of different crops that could be grown in the area, utilizing the crop production cost information developed by the University of California and modifying it for local conditions with expected yield information. The irrigation system types to serve each crop would also need to be included with expected capital repayment costs. A determination needs to be made to estimate how much agriculture could pay for water and infrastructure, while still yielding a reasonable profit to the grower to entice agricultural development.

7) Evaluate the community support for developing agriculture. It is anticipated that some opposition to agriculture would be present, either because of changes to the landscape or the perception that urban areas would subsidize agriculture. Irrigated pasture, for instance, may be more acceptable than cropland because it maintains the current grazing and livestock lifestyle, but irrigated pasture may not be economically possible if there was a significant cost for the delivered water.

8) Evaluate the available water supply and possible diversion locations and perform a conceptual evaluation of several water supply conveyance system alternatives, analyzing possible routes and system types (gravity versus pressurized systems) to serve potential agricultural development land to utilize the available District water supply. Topography would need to be reviewed along with the number of landowners that would need to be dealt with along the conveyance route (the fewer the better). Parcels that are smaller than 20-acres could be identified in the vicinity of each potential conveyance route to help identify the total potential irrigated acreage. A conceptual level cost estimate of a potential preferred conveyance system would need to be performed to consider in the economic analysis.

9) The above information could be used to essentially update the 1960 Tudor Engineering Report that would be helpful in discussing the possibility of developing production agriculture with local landowners and outside investors.

Despite this serious data gap that affects the MAC IRWMP, CCWD has not proposed a project to fill this gap.

Even though CCWD has not provided any studies that investigate these data gaps further, there is ample data available that calls into question the feasibility of developing this level of irrigated agriculture in Calaveras County.

For example, evidence of the growth or decline of irrigated agricultural lands in the Sierra Nevada Foothill counties over the last decade indicates that the greatest amount of additional irrigated agriculture in any such county is 1,638 acres. In fact, another foothill county LOST 2,158 acres of irrigated lands to conversion. (Exhibit 14 – CPC Comments on CCWD UWMP, pp. 10-12.)

Furthermore, CCWD's study admittedly provided no consideration for the fact that the demand for irrigation water will be very sensitive to its price. However, there is data available on the estimated cost of the irrigation water and the value of agricultural crops that can shed light on the economic feasibility of irrigation. Two projects recently considered for tapping CCWD's area of origin water reservations on Mokelumne River were Pardee Expansion and the Inter-Regional Conjunctive Use Project (IRCUP). The estimated cost of water for these for these projects was

$730 per acre foot, and $670 per acre foot respectively. (Exhibit 15, EBMUD Technical Memorandum #6, Cost Estimation Evaluation, 2009, p. 10.) CCWD's study estimates that water usage will be about 3.5 acre-feet per acre. Thus the cost of the irrigation water would be between $2345 per acre and $2555 per acre. The 2009 Annual Crop Report for Calaveras County indicated that only the 800 acres of the county planted in wine grapes yielded a crop valued at more than $2300 per acre. Furthermore, much of the land slated for irrigation is rangeland, that when irrigated produces less than $150 of crop value per acre. (Exhibit 16, Calaveras County, 2009 Report of Agriculture.) Thus, the notion in CCWD's irrigation study that every acre of land available for irrigation will be irrigated with 3.5 acre-feet of water per acre is without basis in fact. It is simply not economical to do so.

Nevertheless, it is only CCWD's reported demand level, based upon a seriously inadequate study using admittedly outdated data, that is reflected in the MAC IRWMP. In addition, this data is used with no reference to CCWD's irrigation study's disclaimers, or to the other data suggesting that the demand estimate is inflated.

We understand that CCWD seeks to inflate its future agricultural demand in an effort to protect its area of origin water reservations against outside intrusion. However, this 12-page study with its long list of caveats is far too small a fig leaf with which to clothe CCWD's area of origin water reservations. CCWD would be much better served by **actually securing those rights in the present,** than by pretending to be able to secure them through a most unlikely future scenario.

What is very distressing about this situation is that this issue of irrigation demand has been raised with CCWD staff, CCWD management, and heard by the CCWD board during the UWMP process, all to no avail. (Exhibit 14 – CPC Comments on CCWD UWMP.) One would hope that the collaborative and regional IRWMP process would provide a forum for resolving these data credibility issues prior to placing unreliable data into the IRWMP. Instead, the IRWMP consultant staff, the facilitator, and the water agencies refused to address these issues. We expect that DWR's IRWMP plan review staff will not be as quick to ignore these data credibility issues.

Section 1.4 discusses water resource issues and major conflicts. Many of these issues are covered in only a single inaccurate sentence presenting false dichotomies.

For example, "Watershed protection versus community economic needs." There is no need for watershed protection to conflict with community economic need. This is being proven by the Amador Calaveras Consensus Project that is putting people back to work in the forest; this time on restoration and fuel reduction projects. If the phrase was "Watershed protection versus watershed damaging forestry practices" then it would reflect a true conflict and a true dichotomy.

For another example, "Insufficient groundwater quantity and quality to accommodate growth." What does that mean? Does it mean insufficient groundwater quantity and quality to build out

isolated rural parcels at their maximum allowed land use intensity under the existing General Plan and Zoning? If so, that does reflect real conflict among groundwater users.

Yet another example, "Obtaining Wild and Scenic River status versus preserving opportunity to develop additional surface water storage." This is another false dichotomy. The only surface water storage that Wild and Scenic River Status prevents is on-stream storage. Wild and Scenic River Status will not affect existing water rights, and will not prevent the development of off-stream storage facilities. If the issue is "Obtaining Wild and Scenic River Status down to Pardee Reservoir versus preserving the opportunity to inundate more of the Mokelumne River with dams," then that would reflect a true dichotomy and a true conflict.

Yet another example, "Protecting and improving fish passage on the lower Mokelumne and Calaveras Rivers versus river-sourced water supply development needs and opportunities." Trap and haul operations could improve fish passage without large reductions in water supply development projects. Also, Calaveras County could perfect its area of origin water rights well before they are needed for domestic use, by storing and releasing the water to improve fishery conditions. In these ways, fishery improvements can occur without serious harm to water project operations. If the phrase is "Protecting and improving fish passage on the lower Mokelumne and Calaveras Rivers at the water diverters expense," then you do identify a true conflict and a true dichotomy.

I have no idea what is meant by, "Wastewater treatment levels and technology versus environment and benefits."

Our communities have been harmed enough by people promoting false dichotomies. There is no need for the MAC IRWMP to engage in that.

C) Recommendations

Make sure that the crosswalk between the sections in the MAC IRWMP and the IRWM standards they cover is in the Final MAC IRWMP Update.

Make the minor editorial changes noted above.

In the Final MAC IRWMP Update, admit that some of the water projects in the IRWMP have land use implications. That is no surprise to anyone. Water agencies supply water to people using land (e.g. farmers, ranchers, residents, businesses, and industries.) It is far more credible to simply admit that fact, than it is to imply that all the water projects have no land use implications, or that the water projects are not "intended" to have land use implications.

In the Final MAC IRWMP, correct the population and population density information on page 1-21 of the Draft MAC IRWMP.

In the Final MAC IRWMP, admit the weaknesses in the water demand projections for the region, and identify a project to improve the accuracy of the demand estimates prior to the next UWMP update.

In the Final MAC IRWMP, rephrase the water conflicts noted above so that they accurately represent the true areas of conflict.

3) Goals and Objectives

A) Standards

The objectives of the IRWMP identify the regional conflicts and water management issues the IRWMP will address. The IRWMP must explain the process used to select the objectives. The objectives should be measurable, so that success in meeting the objectives can be monitored and

reported. At a minimum, all IRWMPs must address: water supply reliability, water quality, threats from groundwater overdrafting; stewardship of aquatic, riparian, and watershed resources; groundwater contamination, and the water related needs of disadvantaged communities. (2010 IRWM Guidelines, pp. 21, 41-44.)

B) Challenge: To select useful Goals and Objectives without RPC members killing one another.

The discussion of Objectives is in Section 3.1.

In the tradition of how the Goals and Objectives were word-smithed by the RPC, I take issue with initial sentence in this section stating that the goals and objectives "were formed through a collaborative stakeholder process." This was stakeholder negotiation, not collaboration. Each side represented its own interests, and did not try to arrive at mutual understanding. The result was consensus based upon exhaustion and pending deadlines, not upon mutual understanding.

When I raised this issue at the RPC, I was told that I was reading too much into the word "collaboration", and that the Wikipedia definition of collaboration was the operative one for our RPC. That definition is as follows:

> **Collaboration** is working together to achieve a goal.[1] It is a recursive[2] process where two or more people or organizations work together to realize shared goals, (this is more than the intersection of common goals seen in co-operative ventures, but a deep, collective, determination to reach an identical objective[*by whom?*][*original research?*]) — for example, an intriguing[*improper synthesis?*] endeavor[3][4] that is creative in nature[5]—by sharing knowledge, learning and building consensus. Most collaboration requires leadership, although the form of leadership can be social within a decentralized and egalitarian group.[6] In particular, teams that work collaboratively can obtain greater resources, recognition and reward when facing competition for finite resources.[7] Collaboration is also present in opposing goals exhibiting the notion of adversarial collaboration, though this is not a common case for using the word.
>
> Structured methods of collaboration encourage introspection of behavior and communication.[6] These methods *specifically* aim to increase the success of teams as they engage in collaborative problem solving. Forms, rubrics, charts and graphs are useful in these situations to objectively document personal traits with the goal of improving performance in current and future projects.
>
> Since the Second World War the term "Collaboration" acquired a very negative meaning as referring to persons and groups which help a foreign occupier of their country—due to actual use by people in European countries who worked with and for the Nazi German occupiers. Linguistically, "collaboration" implies more or less equal partners who work

> together—which is obviously not the case when one party is an army of occupation and the other are people of the occupied country living under the power of this army.
>
> In order to make a distinction, the more specific term Collaborationism is often used for this phenomenon of collaboration with an occupying army. However, there is no water-tight distinction; "Collaboration" and "Collaborator", as well as "Collaborationism" and "Collaborationist", are often used in this pejorative sense—and even more so, the equivalent terms in French and other languages spoken in countries which experienced direct Nazi occupation.

I still say that this was not a collaborative effort. We do not have "shared goals" and "identical objectives." The water agencies have their pet goals and the NGO's have theirs. The water agencies have their pet objectives, and the NGO's have theirs. This is even more obvious when one looks at the agency –driven projects list that neglects key resource concerns like recreation, stormwater runoff, water recycling, agricultural land stewardship, and climate change. (See comments on Project Review Process.) As noted above in the discussion of Governance, we are not "equal partners who work together." We are unequal negotiators. This process was not collaborative, like Rogers and Hammerstein writing a musical. It was competitive: much more like Ali v. Frazier.

I certainly hope that the IRWMP Update was not intended to reflect the negative meaning of collaboration; "referring to persons and groups which help a foreign occupier of their country." However, some of my colleagues in the environmental community might think of me that way after they read the Draft MAC IRWMP

The four paragraphs on page 1 of Chapter 3 are an example of what I referred to above as "a one-sided and too rosy a picture of the actual planning process."

C) Recommendation.

In preparing the Final MAC IRWMP, rewrite page 1 to report to DWR and the public the actual nature of the process, rather than some fictitious ideal.

4) Resource Management Strategies

A) Standards

The 2009 California Water Plan Update provides a list of Regional Management Strategies to encourage diversification of water management approaches. Each IRWMP must consider each of these Regional Management Strategies. To reduce water demand, the state encourages both urban and agricultural water use efficiency. To improve operational efficiency, the state encourages new conveyances, system reoperation and water transfers. To increase water supply the state encourages surface storage, groundwater storage, and recycled municipal water. To improve water quality, the state encourages drinking water treatment, groundwater remediation, pollution prevention, and urban runoff management. To improve resource stewardship, the state encourages economic incentives, ecosystem restoration, forest management, recharge area protection, water –dependent recreation, watershed management, and agricultural land stewardship. (2010 IRWM Guidelines, pp. 21, 44-46.)

B) Challenge: to select and employ the most suitable resource management strategies.

Section 3.2 properly selects the appropriate resources management strategies for the MAC Region.

C) Recommendations.

None.

5) Integration

A) Standards

While most IRWMPs will not have a separate section entitled "Integration", the integration concept must be apparent in other sections of the plan. The intent is that, through development of the IRWMP, separate pieces of the regional water management puzzle are combined into an efficiently functioning unified effort. For example, the governance section may reflect a balanced process that enabled a diverse group of stakeholders to collaborate in developing the IRWMP. For another example, water projects in the IRWMP may reflect an effort both to improve the natural ecosystem and to enhance water supply. For another example, separate local water supply efforts may be combined to form more efficient regional projects. (2010 IRWM Guidelines, pp. 21, 46-47.)

B) Challenge: To chart a course from regional water management chaos toward order.

The MAC IRWMP Update integration efforts have had mixed results.

On the positive side:

Our efforts at identifying how project proponents integrate their monitoring information into the data management system have been good.

Our coordination efforts have been good at every level in the region. Conservation and water agency stakeholders are holding meetings to work out some surface level concerns. The MOKE WISE process may help to resolve inter-regional conflicts. There are two stakeholder groups working on FERC and forest issues in the region, to integrate the efforts of local, State, and Federal entities. (See comments on Coordination below.)

On the negative side:

The public outreach efforts have not resulted in meaningfully involving a diverse group of stakeholders, and many necessary stakeholders did not participate in the process. (See comments on Governance and Stakeholders)

It is still not clear how non-agency stakeholders can contribute data to the process, how their comments will be included in the plan, and how they are to interface with agencies when monitoring data raises concerns. Thus we have not effectively integrated the public's role into the data management and project monitoring functions of the MAC IRWMP. Furthermore, there is still no certain funding for plan implementation monitoring. Thus we have failed to integrate plan monitoring, and the adaptive management processes that should follow it, into the MAC IRWMP. (See Data Management and Plan, Project Review Process, Performance Monitoring, and Governance comments.)

Critical cost and cost share data is missing from the Finance Section, and thus we are not effectively integrating ratepayer concerns into the MAC IRWMP Update process. (See comments on Finance.)

While the data from local water plans is being used in the IRWMP, it is being used uncritically, without regard for its quality or uncertainty. Integration of bad information into the MAC IRWMP Update is not the objective of the integration standard. (See comments on Governance, Regional Description, Relation to Local Water Planning, and Technical Analysis.)

There is precious little integration of water planning efforts and land use planning agency expertise and activities. (See comments on Relation to Local Land Use Planning.)

C) Recommendations

In each of the comment sections noted above as containing negative comments on integration, there are also recommendations for correcting those adverse conditions. Implement those recommendations to solve the integration problems.

6) Project Review Process

A) Standards

An IRWMP must include the process used to submit and to select the water projects included in the IRWMP. Project review must consider how the project contributes to achieving the plan objectives, and to implementing the regional management strategies. Also, project review must consider the project's cost, financing, and economic feasibility. In addition, the project review process must identify the status of the project, and its technical feasibility. Furthermore, the project review must consider environmental justice considerations and the specific benefits of the project to disadvantaged communities. Next, project review must evaluate the project's contribution to climate change adaptation, and greenhouse gas emission reduction. Finally, the project review must consider a project's strategic role in IRWMP implementation. An IRWMP includes a list of the selected projects that systematically compares the aforementioned factors. This information should be used in prioritizing projects. (2010 IRWM Guidelines, p. 21-22, 47-51.)

B) Challenge: to accurately convey the project review process and results.

Section 4.1 of the Draft MAC IRWMP discusses the project review process.

A careful review of the Appendix A Tables on Tier 1 Screening reflects that some resource management strategies are seriously neglected in the project list for the MAC IRWMP Update.

For example, only six of our 37 projects address stormwater flows and transport of sediment and contaminants, and only 4 projects address urban runoff management. Given that one of AWA's justifications for the $13.5 million Gravity Supply Pipeline project is that the new point of diversion is less contaminated by storm runoff from rural residential development, one would think that there would be more projects to remediate this adverse water quality impact.

Only 6 of the 37 projects involve recycling municipal water and only 4 involve matching water quality to use.

Only 6 projects involve recharge area protection.

Only 2 of the AWA's 24 projects improve tribal waters, even though they have a significant Native American population in their service area. Only 4 of AWA's 24 projects ensure equitable distribution of benefits. This confirms concerns found in comments by the Ratepayer Protection Alliance.

Although the region's politics is dominated by anti-regulation and pro-economic incentive rhetoric, there are only 4 economic incentive projects.

Despite the historical and current prominence of the agricultural sector in our region, there are no agricultural land stewardship projects.

A review of the Tier 2 Evaluation table also helps to identify holes in the project list. No projects were ranked high with regard to Criterion 7: Encourage Climate Change Adaptation of Mitigation. Only four were ranked medium. All the rest were ranked low. Climate change is one of the areas that is supposed to be a major focus of improvement for the MAC IRWMP Update, since the 2006 plan did not meet the current climate change standards. Also, climate change is a very high State priority.

In Chapter 4, on page 1, the Draft MAC IRWMP states that project solicitation will occur at least every two years, and that "More frequent calls for projects may be conducted as deemed appropriate by the UMRWA Board of Directors." A project call in May of 2013 might be useful to help the MAC IRWMP project list strategically include more projects that address these policies, statewide priorities, and resource management strategies that are currently under-subscribed on the project list.

Section 4.1.3 describes the rating process in the passive voice. Please identify who rated the projects for each criterion, and the information used as the basis for this rating.

With regard to Criterion 8: Minimize Implementation Risk, the vast majority of the projects were ranked high. However, this is based solely on self-assessment of the project by the applicant. This needs to be disclosed in the IRWMP. By contrast, comments on the project list by representatives of local public interest groups found that the implementation risk was not minimized for the majority of the projects. (See Exhibit 2, Exhibit 3, Exhibit 17 – Comments of Muriel Zeller May 2012.) These very groups have a proven track record of successfully gauging the risk of implementation, and retarding project implementation thorough public advocacy, administrative appeals, litigation, and rate protests. To include in this IRWMP table (Tier 2-Evaluation, Step 1 Apply Evaluation Criteria) only the project specific risk assessment of the project proponent, and to not include anywhere in this section of the IRWMP the risk assessment of public commenters, is misleading to the public and to DWR. When you know that DWR will be relying upon the assertions of material fact in the MAC IRWMP to make multimillion dollar allocations of state funds, you should be much more careful not to be misleading. The State Attorney General's Office takes a dim view of fraud perpetrated upon the State of California.

With regard to Criterion 9: Best Project for Intended Purpose, again the ranking is a self-assessment by the project proponent. This needs to be disclosed in the IRWMP. It is not surprising that all but one project received a high ranking in this category. (See Appendix A, Table Tier 2-Evaluation, Step 1 Apply Evaluation Criteria.) Again, these rankings do not reflect the public comments on these projects.

By not allowing project scoring to be influenced by comments from the public and other RPC members, the RPC skewed the results of the project review process. As a consequence, the project review process ranks the vast majority of the projects as high, and does not serve as an effective tool to distinguish projects on their merits.

On September 24, the RPC was presented with an additional paragraph and table to reflect the additional review of public comments on the project. That paragraph states, "[T]he scores of a subset of the projects included in the Plan have not yet been reviewed and adjusted to the mutual satisfaction of all RPC members." That suggests that the projects that have been vetted have had the scores adjusted to the mutual satisfaction of all RPC members. That is not the objective of the review of public comments. The review of public comments is categorizing the level of disagreement on projects. Some disagreements are being resolved. Other disagreements are not being resolved, and are being scheduled for future discussion. Still other disagreements are so fundamental that they are beyond fruitful discussion. It has been made abundantly clear to the RPC members that they can only influence project application information and scores to the degree that the project proponent agrees to do so. If the project proponent says no change, then no change it is. The IRWMP should not overstate the depth of agreement being achieved by the discussion of the projects.

Section 4.1.5 is a new section that lists consideration for future updates. Throughout these comments I make both recommendations for actions to precede adoption of the MAC IRWMP Update in January 2013, and recommendations for actions prior to DWR's 2014 review of the MAC IRWMP Update. The latter recommendations I would add to the MAC IRWMP Update's new list of considerations for future updates. (See Exhibit 18, Recommendations for Future Amendments.)

The project review section did not include an appendix containing the project applications. The project applications are the meat of this section. Without the project applications, the projects are reduced to mere numbers and titles. Without the project applications, we lose the coherent connection between the merits of the projects and their scores and rankings. It is much easier to get public and State support for a project to provide more fire safety for a disadvantaged community in a high fire risk area by replacing their decaying redwood storage tanks, than it is get support for a project called "Number 16 Lake Camanche Water Storage Tank & Transmission Main" that has 5 high scores and an overall ranking of High. In addition, the project applications help to identify the amount of work needed on these projects. In short, without the project applications, the public and the state will not find the projects compelling. This is another instance when our limited number of projects affords us the opportunity to provide better information in our IRWMP than other regions can.

C) Recommendations

Add a project call in May of 2013 to strategically include more projects that address the policies, statewide priorities, and resource management strategies that are currently under-subscribed on the project list.

Identify who rated the projects for each criterion, and the information used as the basis for this rating.

Disclose those criteria for which the ranking is based upon the proponent's self-assessment.

Change the score ranges that result in a High, Low and Medium final priority to get a more normal distribution of the project rankings. For example, if 6 or more high scores resulted in a final High ranking, then 11 projects would be ranked High. If three or fewer high scores resulted in a final Low ranking, there would be 8 projects ranked low. If 4 or 5 high scores resulted in a ranking of Medium, then 18 projects would be ranked Medium.

Include an additional table in this section of the IRWMP that reflects how public comments on the project list ranked the projects with regard to "minimize risk of implementation" and "best project for intended purpose." This information could be useful when the RPC and UMRWA consider which projects to include in a grant package for 2013. This table could help us achieve

our goal of prioritizing projects that have the best likelihood of being completed in the planning horizon, and our policy of focusing on areas of common ground and avoiding prolonged conflict. Also, this table will provide DWR with the relevant information, and lets DWR decide what weight to give those comments. To withhold that information from DWR is not consistent with the intent of the public participation requirements of the IRWMP Guidelines. (2010 IRWMP Guidelines, pp. 20, 22, 23, 24, 27, 39, 56, 64-66.)

Correct the new paragraph in Section 4.1.3 so as not to imply that the project review process is resulting in a consensus among RPC members with equal bargaining power, and to avoid exaggerating the depth of agreement being reached over the projects and their scores.

To the list in Section 4.1.5 of considerations for future updates add the items listed in Exhibit 18 to these comments.

Add an appendix to the final MAC IRWMP Update that includes the project applications.

7) Impacts and Benefits

A) Standards

This section contains a screening-level review of project impacts and benefits, including those directly affecting environmental justice, disadvantaged communities, and Native American tribes. This review should be used in the future when plan performance is monitored, to see if some project benefits did not result, or if additional adverse impacts did result. Any such changes must be noted when the plan is updated. (2010 IRWM Guidelines, p. 22, 51-55.)

B) Challenge: To provide a general, balanced, comprehensive, and accurate the discussion of impacts and benefits.

Section 4.3 of the Draft IRWMP contains the impacts and benefits analysis.

In table 4-1 the term "Economic benefits" is not strictly accurate. According to traditional microeconomics, funding local infrastructure through grants paid out from state bond proceeds, the interest on which is paid by state taxpayers, does not result in an economically efficient allocation of resources. The actual benefit is to promote local prosperity. However, that comes at a cost to others elsewhere.

Table 4-1 needs to identify more potential impacts of projects.

Wherever the potential benefit is identified as "Economic Benefit", the flip side of the project's potential impacts must also be recognized. For example, as noted above, using this funding mechanism to finance local infrastructure in one place actually poses a real cost to those from another place who pay their taxes, but do not benefit from the program. Thus there is an interregional potential impact of economic loss.

For yet another example, those places that do get grants may create economic hardship for ratepayers who have to come up with the matching funds and operation and maintenance costs. If the ratepayers refuse the rate increase to pay for the operation and maintenance costs, the grant receiving agency may be thrown into fiscal crisis.

With regard to conjunctive use, this benefit comes with a cost to freedom of groundwater use. Those who use groundwater without regulation now will have to come under regulation for conjunctive use to work. This potential impact can be characterized as new regulation or loss of freedom.

With regard to water supply projects and storage facilities, one of the major impacts is recreational use displacement. People who liked flowing water recreation may have that recreation displaced by a reservoir.

Finally, with regard to water supply, water storage, water conveyance, and water treatment facilities, growth inducing and secondary impacts from growth may result.

Generally speaking, there is an imbalance in the treatment of the benefits and the impacts as presented in section 4.3.2. Following the description of each type of benefit, there is a bullet list of potential projects that could result in that benefit. This analysis goes on for 3.5 pages. At the end of that analysis there is a very general statement about potential impacts, without reference to the type of projects they correspond to. There is no bullet list of projects that could result in the impact. This analysis covers less than a page.

With regard to one project, MOKE WISE, Duck Creek Reservoir may still become a project component. Duck Creek reservoir was a component of the MOKE WISE predecessor, IRCUP. Duck Creek remains a priority for the MOKE WISE participants from San Joaquin County. That water storage project is controversial because it would involve a San Joaquin water agency condemning the land, and a wildlife conservation easement on the land that was donated to the California Department of Fish and Game. If public agencies begin to target devalued conservation easement lands for the location public infrastructure, then landowners will stop donating or selling conservation easements. These easements are not only the key to helping the State protect rare plant and wildlife habitat, they are also the key to developers statewide mitigating those habitat impacts to secure project approvals. Ironically, this mitigation need is no more prominent than in San Joaquin County, where programs are in place requiring the acquisition of agricultural land and wildlife habitat offsets.

Since this is a specific impact of a specific component of one project, it may not be appropriate for charting or listing in the very generalized discussions of impacts in this section. Nevertheless, given the gravity of this potential impact, and its statewide implications, it would be a good idea to include a paragraph on it somewhere in Section 4.3. It would improve the degree that we are integrating the concerns of a state agency and RPC members into our IRWMP. I think we would be remiss if we left the concern out of the IRWMP entirely.

C) Recommendations

Change the term “economic benefit” to “local prosperity” in Table 4-1.

Add the additional impacts noted above to Table 4-1.

Balance the presentation of benefit and impact information in Section 4.3.2, so that the description of potential impacts is followed by a list of the type of projects that could generate that impact.

Add a paragraph on the potential of Duck Creek Reservoir to end the use of conservation easements as we know them.

8) Plan Performance and Monitoring

A) Standards

The IRWMP must include performance measures and monitoring to be used in evaluating whether the projects are being implemented, and whether the plan is achieving its objectives. The IRWMP must explain who is responsible for evaluating plan implementation, how frequently they will do so, and who will maintain the monitoring data collected. Also, the IRWMP must identify who is responsible for project-specific monitoring, and when project-specific monitoring plans will be prepared. Such subsequent project-specific monitoring plans will include: a table of what is being monitored for each project, remedies if problems are discovered from monitoring; the monitoring location, frequency, and protocol; the methods of data collection, storage, and sharing; and procedures to fund and keep monitoring on schedule. Finally, the IRWMP must identify the adaptive management procedures for using the plan implementation monitoring data to amend and improve the IRWMP. (2010 IRWM Guidelines, p. 22, 55-56.)

B) Challenge: To fund plan performance monitoring and specify adaptive management procedures.

Section 5.1 of the Draft IRWMP covers plan performance and monitoring.

In Section 5.1.1, on page 1, the Draft IRWMP states, "A MAC Plan Performance Review will be conducted every three years (or as deemed appropriate by the RWMG when funding is available) to evaluate progress made toward achieving Plan objectives." Thus, plan monitoring is uncertain at this time. It is subject to the availability of funding. It is telling that, in 2012, no plan monitoring results are available for the 2006 IRWMP.

Plan monitoring is a key component of the adaptive management required of IRWMP implementation. (2010 IRWM Guidelines, p. 55.) Without plan monitoring, there is no way to determine if the plan is being effective, and no way to make interim adjustments if the plan is not performing well. If UMRWA cannot make a financial commitment to MAC IRWMP plan monitoring, then perhaps it should not qualify as the Regional Water Management Group for the MAC Region.

Section 5.1.3 indicates that after project monitoring, "This information will be fed back into the project's decision-making structure to adapt the project to better meet its overall objectives." That statement is very vague. Which decision-making structure will be activated? Will the RPC or UMRWA, that recommended the project for funding, review the project monitoring data to see if it meets the objectives of the MAC IRWMP? Will the implementing agency review the project implementation to see if it is meeting the agency primary objectives, which may not be as broad as those of the IRWMP? Will DWR, the project's funding partner, review the data to see if it meets DWR's primary objectives, which also may differ from those of the agency or the IRWMP? Will any of these evaluations alert the public that this review and reconsideration of these projects is going on, and that public input is welcome? The general statement in the plan: "Monitoring will also provide a clear reporting mechanism for the public," does not specifically guarantee public participation in the project review process. Adaptive management is a key part of the IRWMP. The plan needs more detail on its application.

C) Recommendations

Make a definitive commitment to fund plan monitoring.

Specify the adaptive management procedures in a way that identifies who will do what, when, and how.

9) Data Management

A) Standards

The IRMP must include a process for data collection, storage, and dissemination to IRWMP participants, stakeholders, the public and the State of California. This information includes project designs, feasibility studies, and information collected in every phase of project development from planning through construction, operation, and monitoring.

The IRWMP should explain the data to be collected, the data collection techniques, how stakeholders contribute data, who will maintain the data, quality control measures for data, data sharing procedures with interested parties and government agencies, and efforts to generate and share data compatible with State databases. (2010 IRWM Guidelines, p. 22, 56-57.)

The public availability of this data is essential to ensure the accountability of local and state agencies. This data will help to determine if projects delivered the promised benefits, if their benefit and cost analyses in the IRWMP were accurate, and if the State chose to spend money

wisely. This data management procedure will help stakeholders in an ongoing effort to provide information useful to the next IRWMP update.

B) The Challenge: To provide a platform for sharing information that is a two way street.

Draft IRWMP Section 5.2 deals with data management. It explains how project sponsors can provide information to the centralized DMS. However, there is no indication of how members of the public, or those on the RPC who are not project sponsors, can provide information to the centralized DMS. These stakeholders must also be allowed to contribute data in some fashion. Again, we are this late in the IRWMP process, and there is still no indication how information provided by stakeholders will be managed.

The Guidelines want the data management section to explain how data will be "shared between members of the RWMG and other interested parties and other interested parties." That is a two way street. Section 5.2 talks about how monitoring data from project sponsors will get to the public. It does not explain how the public can provide information to the implementing agencies. What good is public review of monitoring data if there is no procedure for bringing concerns forward to the proper authorities? Does one go directly to the project sponsor with concerns? To the RPC? To the UMRWA Board? To the regulatory agency with jurisdiction? To DWR? Who in these agencies is responsible for receiving and responding to concerns regarding the IRWMP and its projects? What is their contact information? These questions should be answered in Section 5.2.

On pages 8 and 9 of Chapter 5, the Draft IRWMP identifies data needs for the MAC Region. These include water temperature, quality and streamflow data, watershed conditions, and the location of septic system problems. Is the systematic collection of this data part of the MAC IRWMP implementation? Is this data collection one of the MAC IRWMP projects? If not, how will it be funded? Is this data already collected periodically, and simply needs to be displayed on an accessible website?

On page 9, the plan goes on to state that, "[T]he MAC IRWM program will continue to search for data relevant to the MAC IRWM resource management strategies on an ongoing basis. Any identified data gaps will be filled through the identification of new data sources or new or expanded monitoring activities." Is this data collection one of the MAC IRWMP projects? If not, how will it be funded? This affirmative declaration seems in conflict with other statements in the plan noting that plan monitoring is not a firm commitment, but contingent on available funding. [E.g. see, Section 5.1.1, page 1, "A MAC Plan Performance Review will be conducted every three years (or as deemed appropriate by the RWMG when funding is available) to evaluate progress made toward achieving Plan objectives."]

Some additional data needs related to the projects and plan include:

-Identifying the natural hydrograph for ephemeral the streams that CCWD wants to use to distribute water.

-Getting AWA to complete a strategic capital improvement plan that assesses the cost of projects per beneficiary, and assess ratepayer ability and willingness to pay for infrastructure improvements.

-Identifying and reconciling the growth projections in Amador and Calaveras counties used by the local, regional, and state planning and public service agencies; and the expected level of growth that can be accommodated by these agencies without a decline in level of service.

Section 5.2.1 identifies data collection from "project sponsors" for posting in a centralized DMS on the EBMUD server. At the September 24 RPC meeting, the EBMUD representative had some questions about how that will be administered and funded.

C) Recommendations.

Identify ways that the public and stakeholders other than project sponsors can provide information to the DMS.

Provide instructions for the public and stakeholders to communicate concerns to the relevant authorities, in a manner that will result in a prompt response to the concern.

Make a clear and unambiguous commitment to plan monitoring and data collection, and identify the means for funding the efforts.

Add the data gaps noted above to the list on pages 8 and 9 of Section 5.2.1 of the Draft IRWMP. Fill those gaps.

Work out the deal with EBMUD to store the DMS on their server.

10) Finance

A) Standards

In most cases, State funding provides only a very small supplement to the local funds necessary to implement water and wastewater treatment projects. Most of the project costs will be borne by local entities. The Finance section should explain how the many funding pieces fit together for each project.

The Finance section of an IRWMP includes a description of funding for ongoing IRWMP implementation, and of funding sources for specific projects and programs. Project information should include sources of funding for project construction, operation and maintenance. The percentage of funding from each source should be identified. The IRWMP should identify the certainty and longevity of each funding source. The intent of this section is not to demonstrate that all project funding has already been secured, but to demonstrate that the project proponent has thought through how the entire project will be financed. (2010 IRWM Guidelines, pp. 22, 58-59.)

B) Challenge: Disclosing O& M costs and the percentages of funding from each source.

Section 4.4 and Appendix B deal with financing the plan. The first paragraph of Section 4.4 provides a refreshingly realistic assessment of the harsh facts regarding project funding.

The discussion of Capacity Fees on page 23 and 24 of Chapter 4 states that they are used "to achieve and maintain equity among past, present, and future customers." However, there is no mention that this is a controversial issue for project proponent AWA. One of the chief concerns of the comments by the Ratepayer Protection Alliance is the fact that, in the recent past, connection fees have not provided for equity among present and future AWA customers. Their concern is that implementation of MAC IRWMP Update projects proposed by AWA will similarly not provide for customer equity. This concern is supported by the fact that AWA could only assure that it would meet the statewide priority of equitable benefits distribution for 4 of its 25 projects. (Appendix A, Table, Tier 1 Screening, Step 1, Reflected Goals and Statewide Priorities.) This ratepayer concern should be disclosed in this section.

The discussion of recycled water and its costs on pages 25 and 26 is too simplistic to be objective. First of all, recycled water is not a "non-water supply" project. Recycled water is an addition to an agency's water supply. Second, when allocating the cost of recycled water, one must also consider if there is a cost saving to the wastewater disposers. In that instance, some of the costs of the recycled water should not be charged to the end user, but to the wastewater disposers. Water recycling is not a good example for the topic under discussion

The table in appendix B does not identify operation and maintenance costs for projects, and it does not disclose the funding sources by percentage of costs, as does the sample table in the IRWM Guidelines. These are huge issue related to the financial feasibility of the IRWMP. As noted in this section, payment of the "O & M" costs "will likely come primarily from local sources including rates, fees, and assessments." Also, ratepayers want to know what their share of the total project costs will be. In these rural counties with very few ratepayers, the personal share of project costs can skyrocket quickly. Local economic conditions are not good, and these costs can result in real economic hardship. The lack of this cost and cost share information is especially difficult for the under 7,000 AWA connectors, who are looking at an IRWMP that proposes over $230 million in capital improvements, and who have no Capital Improvement Plan to consult for further details.

Not disclosing the "O&M" costs and not disclosing the percentage of total costs to be borne by local funding sources will not convince DWR that we have "thought through financing of the plan and implementation of the projects." (2010 IRWM Guidelines, p. 59.)

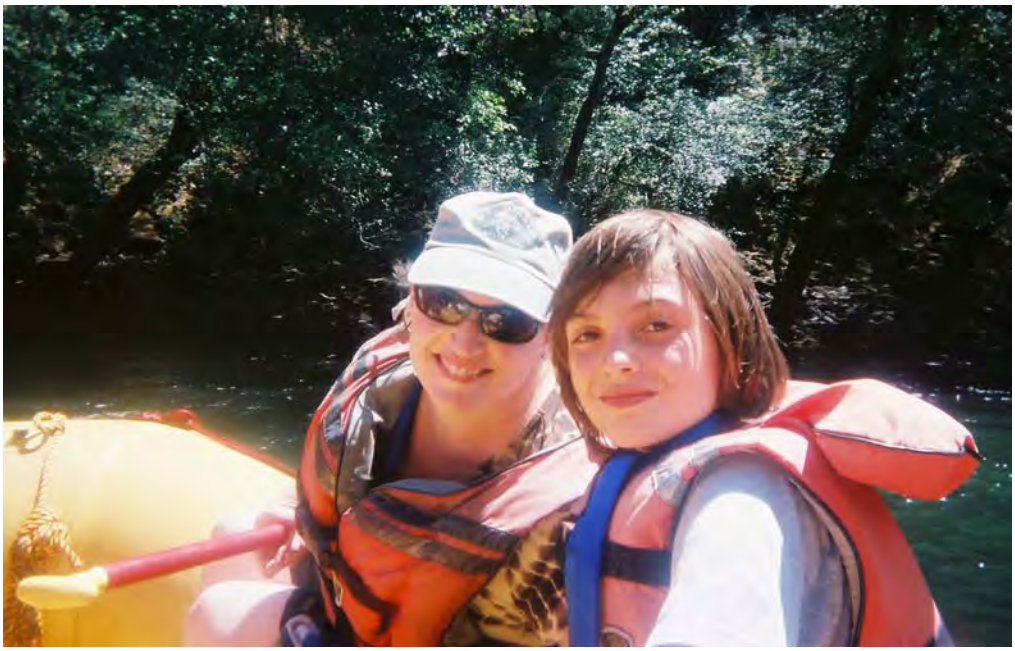
C) Recommendations

Disclose expressed concerns by the Ratepayer Protection Alliance that, in practice, capacity fees charged by the AWA are resulting in an inequitable share of costs being borne by existing customers relative to future customers.

Delete the recycled water example from the discussion of “O&M” costs.

As discussed at the RPC meeting on September 24, encourage project proponents to estimate the O&M costs and the local cost shares as soon as possible, and add them to the table in Appendix B by 2014.

When considering projects for the 2014 grant package, the RPC may want to favor those noncontroversial projects that also have estimated O&M costs and local cost share percentages.



11) Technical Analysis

A) Standards.

The IRWMP must reference the documents and the data analyses that support the plan. The intent of this standard is to ensure that the IRWMP is based upon sound information. The IRWMP must explain the techniques used to forecast water management needs throughout a plan's 20-year horizon.

The IRWMP must explain why the information used is adequate, and provide references to its sources. For each data source, an IRWMP explains what the study did, what outcomes resulted, what level of uncertainty applies to the data, and how the data was used in the IRWMP. Any data referenced should be made available to the public upon request. An IRWMP identifies data gaps and how they will be bridged by IRWMP implementation. (2010 IRWMP Guidelines, pp. 22, 59-60.)

B) Challenge: To disclose the uncertainty regarding data, and the need to fill data gaps.

According to the draft table that was supposed to go into Chapter 1, Chapter 4.5 deals with the technical analysis issues.

Section 4.5 directs the reader to the table in section 4.2.2 for the list of key planning reports used in the MAC IRWMP Update. That list includes the current AWA and CCWD Urban Water Management Plans. That list does not identify the level of uncertainty for any of the data in any of the reports relied upon in the MAC IRWMP Update. As noted above, this disclosure is required by the 2010 IRWM Guidelines. As noted in the Governance and Regional Description sections above, and the Local Water Plan section below, there is a huge level of uncertainty regarding the demand data in the Urban Water Management Plans.

In addition, Section 4.5 provides no specific information regarding identified data gaps, and no specific information about how those data gaps will be filled by implementation of the plan. Even where there are admitted data gaps, the MAC IRWMP Update does not specifically identify the need for those studies as part of a project, or otherwise ask for funds to fill those data gaps. As noted above, CCWD's irrigation water study called for further analysis of irrigation water demand. That data gap creates a huge credibility gap for the MAC IRWMP. Yet no CCWD project proposes to complete the studies needed to refine that assessment. Another major data gap is that, although the AWA has proposed over 230 million dollars in projects, AWA has no capital improvement plan that identifies, phases, prioritizes, or finances these projects, or has the approval of the AWA Board and its ratepayers. Yet no proposed AWA project includes the funding and preparation of such a strategic capital improvement plan. Also, although CCWD proposes to "restore" ephemeral streams by using them as conduits to deliver water (Project 23), the project does not specifically call for the study of the previous natural hydrograph to guide this restoration. (CCWD, Project 23, New Hogan Reservoir Pumping Project Application, p. 4.) Unless the data gaps are identified and filled, incomplete agency information may just languish as such, and remain a shaky and controversial basis for seeking project funding.

C) Recommendation

Before 2014, review the studies that form the basis for the MAC IRWMP and the technical feasibility of the projects. Assess the reliability of their data, and put that information in the tables in Sections 4.2.2 and 4.5. Also, where those studies identify data gaps, identify those gaps in Section 4.5. Include in the IRWMP a request for funding to fill the data gaps in the documents upon which the plan relies. Also, if the data gaps are related to specific proposed projects, add to those project proposals the completion of the additional studies, and the funding needed to complete them.

12) Relation to Local Water Planning

A) Standard

For regional water planning to be effective, it must objectively and fairly incorporate local planning information. The intent of the standard is to ensure that an IRWMP is congruent with local plans, and includes information from current local water plans. Thus, an IRWMP will consider local plans for groundwater management, urban water management, water supply assessments, agricultural water management, flood protection, watershed management, stormwater management, low impact development, and disaster response.

In describing the use of these plans, the IRWMP includes the jurisdiction of the local plan, when it is updated, how it may be influenced by the IRWMP, inconsistencies between the local plans and the IRWMP, and how those inconsistencies might be resolved. An IRWMP must include coordination between local and IRWMP content, information from local plans that is both current and accurate, information from local plans regarding water management and climate change issues, and water management tools or criteria from local plans. (2010 IRWM Guidelines, pp. 22, 60-61.)

B) Challenge: To include the whole truth in the IRWMP Update.

Section 4.2 of the IRWMP addresses this issue. This section includes a list of "initiatives and accomplishments" "indicative of local water planning" and its "interconnectivity with the IRWMP Update. The first example listed is "Inter-regional Conjunctive Use Concept Evaluation." and its identification of the Inter-regional Conjunctive Use Project." (DRAFT IRWMP, Chapter 4, p. 8.)

Unfortunately, because there is a lot not disclosed in that discussion of IRCUP, this is another section of the Draft MAC IRWMP Update that presents a one-sided and too rosy a picture of the actual planning process. What that discussion does not disclose is that the Integrated Regional Conjunctive Use Project (IRCUP) included two projects (Duck Creek Reservoir and Pardee Reservoir Expansion) strongly opposed by local, regional, and statewide conservation groups; and the former criticized by the State Department of Fish and Game. (Exhibit 19, DFG, Letter on Duck Creek, pp. 2-3.) In fact, the IRCUP failed to make the cut for inclusion in the Draft MAC IRWMP projects list. Furthermore, despite promises in the adopting resolution for the 2006 IRWMP, EBMUD did not involve Amador and Calaveras stakeholders in a collaborative process to plan for Pardee Reservoir Expansion. Instead, they formed a Community Liaison Committee that did not include Amador and Calaveras representatives. (Exhibit 20 – 2009 EBMUD Hearing, Testimony of Steve Wilensky, p. 4.) Not surprisingly given the extent of public opposition to these projects, both of the Duck Creek and Pardee Expansion projects have already resulted in litigation. (See Exhibit 21 – Ruling in Foothill Conservancy v. EBMUD.) Thus, while I would somberly agree to characterize the process that birthed IRCUP as unfortunately "indicative of local water planning," I would not characterize this historical mistake as having direct or close interconnectivity with the MAC IRWMP Update. Instead, today there is some hope for conflict resolution on this front, because the next inter-regional planning process, MOKE WISE, includes more participation by local conservation groups at the feasibility study and project design phases.

Section 4.2.2 indicates states that the MAC IRWMP update was developed "based on collaborative discussions" that identified shared needs and "opportunities for collaboration." The section then goes on to list the data sources used in the IRWMP. The highly finessed implication being that the data sources used for the plan were the result of the immediately aforementioned collaborative effort. That implication is not accurate.

Two RPC members were concerned that the information to be used in the IRWMP from the local Urban Water Management Plans was not "Relevant, current and accurate" as required by the IRWM Guidelines. (2010 IRWM Guidelines, p. 61,) The two RPC members were told by the RPC facilitator, the RPC consultants, and the RPC members that the data from the UWMPs would be used, and that any questioning of that data was outside the scope of the RPC. The minutes of that meeting do not reflect that any procedure was agreed upon to allow non-agency RPC members to contribute local water planning data into the IRWMP process. The

disagreement was noted and to be recorded in the MC IRWMP, Section 1.4.1. End of story. (See Minutes of RPC Meeting 10/12/11, p. 5.)

Thus, unless the NGO's could convince the agencies to change their data voluntarily, the consultants have said that they will accept only the agency version, regardless of ample evidence to the contrary.

As noted above in comments on the Regional Description, the huge future growth in irrigation water demand from the CCWD UWMP is based upon a weak study using 40-year old data. Evidence of the growth or decline of irrigated agricultural lands in the Sierra Nevada Foothill Counties over the last decade provides no indication of such enormous growth in irrigated acreage, and indicates that some counties have actually lost irrigated acreage over the last decade. Furthermore, CCWD's study did not use current water costs and crop values to estimate the financial feasibility of irrigation. Available data suggests that CCWD's notion that every acre of land available for irrigation will be economically feasible to irrigate with 3.5 acre-feet of water per acre is without basis in fact.

Nevertheless, it is only that inflated irrigation data that is reflected in the MAC IRWMP, with no reference to the study's disclaimer, or to the other data suggesting that the demand estimate is inflated.

Similarly, the above comments on the Regional Description explain the weaknesses in the demand estimates derived from the AWA UWMP.

C) Recommendations

First, edit the discussion of IRCUP, to provide a detailed explanation of how it failed, and to explain how it was not a collaborative effort of relevant regional stakeholders. After that, feel free to acknowledge what was learned, and how we hope to avoid this mistake in the future. If we cannot demonstrate adaptive management based upon the 2006 MAC IRWMP, how can we convince DWR we will do adaptive management in the future?

Second, in the section regarding the local water planning documents used in the IRWMP, please delete the three misleading introductory sentences to Section 4.2.2 on page 9, and instead provide a detailed explanation of the unresolved controversy over the quality of the water demand data.

13) Relation to Land Use Planning

A) Standards

The IRWMP should include processes that foster communications between regional water managers and land use planners. (2010 IRWM Guidelines, pp. 23, 62-64.)

The IRWMP should explain the current relationship between regional water planning and local land use planning, and future efforts to improve collaboration. It should answer questions like: How do water managers and planning agencies interact? Do they provide input on each other's projects? Are local land planners included in the IRWMP governance structure or project selection committee? Do the answers to these questions suggest that improvement is needed in future communications and collaboration? If so, the IRWMP should identify these future efforts. For example, it could suggest new forums needed for these professionals to interact.

To facilitate more effective IRWMP implementation, water agencies can seek useful input from land use agencies on issues such as flood management, groundwater recharge, conveyance facilities, stormwater management, water conservation, and watershed management. In turn, land use agencies can get useful advice from water agencies on landscaping programs, recreation, long-term planning, development review, public safety, and habitat management.

The intent of the standard is to require an exchange of knowledge and expertise among these resource professionals. The goal is for these managers to make informed, collaborative, and proactive decisions. The old model of reactive decisionmaking must be changed.

B) Challenge: To improve the working relationship between land use planning and water agencies.

The crosswalk table indicates that Chapter 4.2 discusses Standard 13, Coordination with Water and Land Use Agencies. That section only mentions that local governments were represented in the 2006 MAC IRWMP. There is no mention of planning staff participation, nor any sharing of information between land use planning and water agencies.

During this update of the MAC IRWMP, the staff of the local planning agencies (E.g. City & County Planning Departments, public works, environmental health, LAFCO) have not attended RPC meetings or participated in the update process. Nor have representatives of the service districts and utilities (E.g. fire districts, ACTC, Calaveras COG, PG&E) attended, even though those entities have a key role in future development. Thus, these agencies continue to engage in short-term and long-term planning in the comfort of their own professional silos, if at all.

While State Law requires water supply studies prior to local government approval of large projects (500 units or more), such large projects are infrequent in these rural counties, and there is really very little other coordination between local water agencies and local land use agencies. As a result, water agencies continue to plan for water delivery to ridiculous levels of cumulative buildout, without consideration for the work of land use agencies, or coordination with local land use authorities. For example, AWA assumed ridiculous levels of upcountry development, based upon ludicrous planning assumptions, in its environmental assessment of the Gravity Supply Line (GSL) project. (See Exhibit 7 - Foothill Conservancy GSL Comment Letter, 12/29/09.) When ratepayers asked what priority level the GSL had in the AWA Capital Improvement Plan, they found AWA had no long-term capital improvement plan. The petal hits the metal when ratepayers are asked to pay for these seemingly randomly selected capital improvements. The AWA has lost three rate protests in recent years. (See Exhibit 3 – RPA 218 Protest Results.)

For another example, in Calaveras County the Urban Water Management Plan is preparing to deliver 100,000 acre feet of irrigation water to 29,000 acres of irrigated agriculture. No such level of growth in irrigated agriculture is mentioned in the current Calaveras County General

Plan, or in the draft Agriculture Element of the proposed General Plan Update. On the positive side, both CCWD and Calaveras County are presuming average annual population growth between 1.43% and 1.97%. (Exhibit 11 – Calaveras GPU Alternatives Report, p. 8.) However, the Regional Transportation Plan indicates that the County can only fund about a third of the costs of the roads needed for that growth. (Exhibit 22 – Calaveras COG Draft RTP, pp. 110-114.) Thus, the failure to get these agencies together is resulting in isolated efforts that fail to realistically plan for the future prosperity of the region.

C) Recommendations

First, during 2013 there needs to be meetings (or series of meetings) in Amador and in Calaveras counties so that each of the land use and public service agencies can present their long-term plans for serving existing residents and the additional population and economic growth they expect. Then they need to compare these plans for consistency. Where inconsistencies exist, the agencies and districts need to come to some agreement on some basic level of growth that they all can accommodate. Each agency can then make an interim plan to most efficiently and effectively serve the existing population and the additional basic level of growth. The projects that are needed to serve existing residents and that basic level of growth need to become a high priority for the agencies. Then, the projects in the IRWMP project's list can reflect those high priority projects. The MAC IRWMP can be amended to describe these meetings and to summarize their results. Since both Amador and Calaveras counties are in the middle of comprehensive General Plan Update processes, now is the perfect time to begin these agency coordination efforts, and to inform those planning processes.

Second, there needs to be a quarterly public meeting of these agencies to exchange current project lists and to consult each other regarding the lists. It is shocking to me that AWA is adopting two CFDs, and not providing basic map information the LAFCO staff, simply because LAFCO approval is not required by law. If we are ever to get public support to implement government plans, the agencies will have to show more coordination and collaboration. As Air Quality planners in the Bay Area in the 1980's, we met monthly with ABAG and Caltrans to review project lists and compare notes. Without communication and coordination, government planners with conflicting ideas just confuse the public they are supposed to serve.

Currently, Amador County schedules monthly meetings of its own staff to publicly review proposed land use projects. Lately, many of these meetings have been canceled due to lack of project applications to review. Perhaps one of these meetings per quarter could be re-directed toward the interagency sharing and discussion of projects and plans discussed above.

These efforts would meet the IRWM standard to describe "future efforts in the process of establishing a proactive relationship between land use planning and water management." (2010

IRWMP Guidelines, p. 63.) The IRWMP Guidelines create a reason and a financial incentive for initiating and continuing these inter-agency communication efforts.

If we are not going to do the above, at least explain what is being done to coordinate water and land use planning in the MAC Region. For example, a draft water element for the Calaveras County General Plan Update includes many provisions for getting the County and the CCWD to work together better. (See Exhibit 23, Calaveras GPU Draft Water Element.) This issue of land use and water agency coordination is not treated with any detail in section 4.2 of the Draft IRWMP. If precious little is being done, then admit that. Don't just "finesse" the issue.

14) Stakeholder Involvement.

A) Standards

The intent of the standard is to ensure that all stakeholders have an opportunity to actively participate in the IRWMP decisionmaking process on an on-going basis.

Stakeholders are needed to gather regional information and to make regional decisions. The IRWMP processes should support stakeholder involvement. As noted above in the in the comments on the Governance section, the IRWMP explains the efforts made to identify, to inform, to invite, and to involve in the planning process water purveyors, wastewater agencies, flood control agencies, city and county governments, special district, electrical utilities, Native American tribes, self-supplied water users, environmental stewardship organizations, community organizations, tax-payer groups, recreational interests, industry organizations, state and federal agencies, and disadvantaged communities. The IRWMP must explain how the collaborative process engaged a balance of the interest groups. (2010 IRWM Guidelines, p. 23-24, 64-67.)

B) Challenge: To Improve Public Outreach.

As noted above in the comments on the Governance section, the problem is that the lengthy commitment to participate on the RPC (August 2011 to January 2013) drove stakeholders away from the planning process. The only other opportunity to participate is through the public comment process. That process left much to be desired as well. It provided only a short time to review and comment on the draft IRWMP (September 14 to October 3). (With regard to local projects and plans subject to CEQA, the public is used to getting at least a 30-day review period.) As a group, the RPC resisted considering public comments received on the IRWMP projects list in May. It was only later, after RPC members and agency staff began to meet on their own to resolve project differences, that the RPC accepted the conflict resolution procedure. There need to be more opportunities to participate and to provide input into the planning process between the two poles of RPC membership and public commenter.

Currently, our RPC has limited regular participation and limited intermittent participation. The water agencies, the Foothill Conservancy, the CPC, and the City of Plymouth attend regularly. We have had occasional visits from the City of Jackson, and the Forest Service. Trout Unlimited came initially and withdrew.

Unfortunately, a lot of important parties did not attend the RPC meetings. Wastewater Agencies ARSA and San Andreas Sanitation District did not attend. The County Health Departments, responsible for regulating septic systems and small potable water systems, did not attend. The electrical utility, PG&E did not participate, even though their proposed pump-storage facility at Bear River Reservoir may conflict with EBMUD and its partners' plans for increased water storage at Lower Bear River Reservoir. Special Districts like the Fire Districts, who depend on the upgraded pressurized water systems under consideration for funding, did not participate. BLM did not attend, even though they are a major landowner with jurisdiction over river recreation and abandoned mines and their drainage remediation. FERC did not participate, even though they have jurisdiction over power production at reservoirs in the region. Native American Tribes, a key constituent that the IRWMP is supposed to consult and serve, did not participate. Taxpayer and ratepayer groups did not participate in the RPC, but one did provide public comments on the projects. Though one realtor did sign up to participate, she did not subsequently attend, even though she was the only representative from the commercial and industrial sector.

Unless the RPC creates more opportunities to get input from these very important parties, the MAC IRWMP Update's list of participants will appear too narrow, and may harm our chances of having a plan that qualifies our grants for funding in 2014.

C) Recommendations.

First, try to hold a series of individual meetings to invite key missing stakeholder groups to put their two cents worth in on the plan (i.e. city and county governments planning and health department staff, school districts, Calaveras COG & ACTC, electrical utilities, Native American tribes, self-supplied water users, community organizations, tax-payer and ratepayer groups, recreational interests, industry organizations, state and federal agencies, and disadvantaged communities.). For example, on one day you could have a meeting with City and County planning staff, COG staff, ACTC staff, School Districts.

If this does not work, delegate to RPC volunteers the responsibility of meetings one-on-one with additional stakeholder groups or their representatives. Provide RPC volunteers with questions to ask and materials to share.

Note the suggestions of these new stakeholders. If project ideas result from these meetings, encourage participants to sponsor or cosponsor a project proposal for addition to the plan. Prior to the 2014 grant package submittal, add notes on their suggestions in the implementation section, and amend the plan as needed based upon their suggestions. It is not too late for the MAC IRWMP Update to do a more comprehensive job of outreach to important participants. If we fail to do so, we will only have ourselves to blame should DWR find this flaw fatal to our MAC IRWMP.

When the next comprehensive IRWMP Update takes place, work these stakeholder subcommittees into the regular planning schedule.

15) Coordination

There are three levels of required coordination.

First, the IRWMP must establish a process to coordinate stakeholder activities to avoid conflicts. This could include bringing local water agencies and stakeholders together in a setting where projects and activities can be discussed.

Second, the IRWMP must identify ways to collaborate with neighboring regions to avoid conflict, to avoid redundant projects, or to reveal opportunities for cooperative projects. It must identify common water management issues among neighboring regions, describe existing coordination efforts, and discuss joint project opportunities.

Third, the IRWMP must identify ways that the State and Federal governments can work with local agencies to promote effective plan and project implementation.

The intent of the standard is to reduce conflict among stakeholders and among neighboring regions; and to build effective working relationships with State and Federal agencies. (2010 IRWMP Guidelines, pp. 24, 67-68.)

B) Challenge: How to move from conflict and neglect toward collaboration.

Regarding the first standard of working out conflict among stakeholders, the region gets an A- for working out conflict over projects. Policy 4 of the plan is to "Focus on Areas of Common Ground and Avoid Prolonged Conflict." Before the ink was even dry on the draft plan, EBMUD, AWA, and CCWD met with concerned stakeholders to go over their comments and concerns regarding the project list. These meetings are ongoing and resulting in agreement regarding some projects. We expect the meetings to continue after plan adoption, to try to resolve core policy issues. The only problem at this time is that AWA expressed concern that it may not be able to amend its projects as agreed upon in time for MAC IRWMP Update adoption in January 2013.

Regarding the second standard, for working out conflicts with other regions, Chapter 1.1.2 explains that. That section explains that the MAC region and the Eastern San Joaquin region have been engaged at regular coordination at the agency level. (Draft MAC IRWMP, Chapter 1, p. 1-5.) Unfortunately, what that section does not disclose is that the product of that coordination, the Integrated Regional Conjunctive Use Project (IRCUP), included two projects (Duck Creek Reservoir and Pardee Expansion) strongly opposed by local, regional, and statewide conservation groups. Both those projects have already resulted in litigation. Thus, I would hardly characterize the initial agreements of these agencies as a successful effort at inter-regional cooperation. Today, there is some hope for conflict resolution on this front, because the next inter-regional planning process, MOKE WISE, includes more conservation group participation.

The standard for coordination with State and Federal agencies is addressed in only two short paragraphs totaling 5 sentences. (Draft IRWMP, Chapter 2, p. 11.) The first paragraph indicates that UMRWA will coordinate with the unspecified "appropriate agencies." The second paragraph indicates that IRWMP projects will get the necessary permits and complete the necessary environmental reviews. That is the minimum level of coordination required by law. Given that the MAC Region includes extensive BLM and USFS land and water holdings, numerous hydropower facilities regulated by FERC, an existing conflict over the use of Forest Service lands for reservoir expansion at Bear River Reservoir, and at least two existing stakeholder groups that are already coordinating with federal agencies, one would expect more details in the MAC IRWMP.

C) Recommendations

First, we strongly recommend that either AWA staff or IRWMP consultants find the time in the next three months to make the agreed upon amendments to the draft plan.

Second, in the final IRWMP, please disclose the whole truth about the results of the MAC and Eastern San Joaquin interregional coordination efforts, including the fact that it did not result in a set of projects that resolved regional conflicts.

Third, there is currently an ERC that includes stakeholders overseeing implementation of FERC Project 137 on the Mokelumne River. There is also an Amador Calaveras Consensus Group working with BLM and the USFS on forest restoration and fuel reduction projects. If the MAC IRWMP needs to improve coordination with federal agencies actively involved with watershed management, the IRWMP should commit to sending a delegate to attend one or more of these existing stakeholder groups, to provide information regarding IRWMP projects, and to report back to UMRWA.

16) Climate Change

A) Standards

An IRWMP must discuss both mitigation of greenhouse gas emissions, and adaptation to the effects of climate change.

As part of this effort, an IRWMP explains how GHG emissions are disclosed and considered when choosing among project alternatives. In many cases, this is currently done late in the planning process through quantitative project-level analyses in accordance with the California Environmental Quality Act (CEQA). However, the Project Review section of the IRWMP must include a less detailed analysis of a project's contribution to reducing GHG emissions and adapting to climate change.

The IRWMP also discloses the potential impacts of climate change on the region, including the water-related impacts on public safety and ecosystems, as well as on water supply reliability. The IRWMP should address the changes in water runoff and in groundwater recharge. The IRWMP Region Description section describes these impacts.

At this time, when considering adaptations to climate change, regions are encouraged to adopt "no regret" adaptations. These are policies, projects and programs that both make sense in light

of current water concerns, and also help in terms of climate change adaptation. These include ongoing practices such as increasing water use efficiency, sustaining ecosystems, and integrating flood management. The Plan Objectives and Resource Management Strategies sections of the IRWMP should include the region's approach to these "no regret" adaptations.

The IRWMP should contain provisions explaining how adaptive management will be used to respond to climate change challenges as new information becomes available. These provisions should appear in the Plan Performance and Monitoring section of the IRWMP.

In the future, as the analytical tools become available, IRWMPs will have to provide a more detailed evaluation of the adaptability of the region's water management systems to climate change. (2010 IRWM Guidelines, pp. 24, 68 – 76.)

B) Challenge: How to address climate change prevention and adaptation in a region that is not concerned about climate change?

Climate change is one of the areas that is supposed to be a major focus of improvement for the MAC IRWMP Update, since the 2006 plan did not meet the current climate change standards. Also, climate change is a very high State priority. The crosswalk table indicates that climate change is addressed in Section 1.3 of the MAC IRWMP Update. That section covers less than two pages. As noted below, climate change is also addressed in other sections of the Draft MAC IRWMP Update (e.g. Section 3.1, Section 3.2, and Section 4.1)

The discussion of climate change in Section 1.3 does a good job of identifying some of the primary physical changes to the environment. However, it does not trace those primary physical changes, down the chain of cause and effect, to the ultimate impacts on the human environment, and then to the means to reduce those impacts.

For example, Section 1.3 describes reduced natural water storage, but does not explain that the result could be insufficient water supplies for people and wildlife. It does not go on to note the options to adapt to this condition in the MAC Region: increased water recycling, increased water use efficiency, restoration of natural water storage systems, and increased water storage.

For another example, Section 1.3 describes a potential increase in water temperature, but it does not indicate what impacts that will have on the fish and amphibians of the MAC Region, and it does not identify the options for reducing those impacts.

For a final example, although Section 1.3 does indicate that air temperature may increase, it does not identify the potential impacts on watershed vegetation, fire safety, or surface water evaporation; and the means of reducing those impacts.

In part as a result of these deficiencies in Section 1.3, the Draft MAC IRWMP Update barely begins to identify the projects needed to adapt to the most serious water-related consequences of climate change.

The discussion of climate change does not address how GHG emission reduction was considered in evaluating projects proposed in the IRWMP. The IRWMP should note that most of the proposed project applications did not even bother to fill out the section on climate change. (See for example, applications 1 through 20, 23, 24, 25, and 27.)

Section 3.1 of the Draft MAC IRWMP Update discusses goals, objectives, and policies, but it does not specifically call out the many that address climate change adaptation. As a result, these may not get picked up by somebody reviewing the plan at DWR. For example, the Draft MAC IRWMP includes policies for the long-term balance of supply and demand, and for resource stewardship. It includes goals to insure sufficient water supply, to promote water conservation, to develop drought mitigation, and to improve natural watershed processes. It includes objectives to incorporate climate change into long-term planning, and to increase water recycling. All of these provisions of the Draft MAC IRWMP Update address climate change adaptation, and should be recognized as such in the text of Section 3.1. Let's not burry the things we do right. Let's highlight them.

Section 3.2. of the Draft MAC IRWMP Update discusses regional management strategies, but it does not specifically call out the many that address climate change adaptation. The strategies selected for the MAC IRWMP Update deal with water use efficiency, conjunctive use, recycled water, ecosystem restoration, forest management, and watershed management. Each of these strategies is an adaptation to climate change, and should be recognized as such in the text of Section 3.2. Let's not burry the things we do right. Let's highlight them.

Section 4.1 on the project review process does explain how projects were evaluated for climate change mitigation and adaptation. (See Draft MAC IRWMP Update, Chapter 4, p. 4.)

The statewide priority standards for climate change are very generous. (2012 IRWM Guidelines, p. 13.) Any project that increases water use efficiency can claim climate change benefits. This is true even if the saved water is not held in reserve for responses to drought from climate change, but is instead used to supply more developments, that in turn put more people at risk of drought. That is not really adapting to climate change. That is water agency business as usual. On the other hand, water recycling that shifts more of the local water supply to a source that is available even during a drought, and requires less raw water to serve the same population, is <u>real</u> adaptation to climate change. I think DWR needs to clarify what types of projects can claim climate change benefits. In the meantime, as a result of the generous statewide priority standards, 11 of the 38 projects in the Draft MAC IRWMP Update qualify as climate change response actions. (See Chapter 4, Table 1- Screening, Step 1 – Reflect Goals and Statewide Standards.)

However, the Draft MAC IRWMP Update does not look so good when one reviews the rankings of projects regarding climate change adaptation and mitigation. In the table in Appendix A, one finds that no projects get a high rating for dealing with climate change, only 4 projects get a

medium rating, and all the rest of the projects get a low rating. (Chapter 4, Appendix A, Table, Tier 2 - Evaluation, Step 1 – Apply Evaluation Criteria.) In many cases, the low rating was given because the water agency proposing the project did not bother to evaluate the project's climate change implications, and simply left that section of the project application blank. (See project applications 1 through 20, 23, 24, 25, and 27.)

This is not really a surprise. In general, the region is politically conservative, and so climate change prevention and adaptation are not high on the list of local government priorities. Even when a plan or project rises to the level of preparing an Environmental Impact Report, the issues of climate change are quickly dismissed, without the adoption of additional feasible mitigation or the serious consideration of alternatives.

As noted above in comments on plan performance and monitoring, Section 5.1 is very general in nature and lacks many important details. Unfortunately, it does not specifically discuss how monitoring and adaptive management will be used to respond to climate change challenges as new information becomes available.

C) Recommendations.

In the crosswalk table, add Section 3.1, Section 3.2, and Section 4.1 to the list of sections that address climate change mitigation and adaptation.

In Section 1.3, trace those primary physical changes noted (i.e. air temperature, water temperature, and water storage) down the chain of cause and effect to the ultimate impacts on the human environment, and to the means to reduce those impacts.

Add to the project evaluation process a primary-level assessment of GHG reductions from each project. Explain that process in Section 1.3. Report the results in of the analysis in Chapter 4.

In the text of Section 3.1 of the final MAC IRWMP Update, specifically note the many goals, objectives, and policies that address climate change adaptation.

In the text of Section 3.2 of the final MAC IRWMP Update, specify the selected regional management strategies that address climate change adaptation

At the last RPC meeting, staff encouraged the water agencies to review their projects to see if any of them deserved a higher rating for climate change mitigation and adaptation. It is my recommendation that the RPC continue to look for additional climate change response projects, even after plan adoption in January 2013, and add them to the project list before 2014.

Add to Section 5.1 a specific explanation of how monitoring and adaptive management will be used to respond to climate change challenges as new information becomes available.

Conclusions

From a fiscal, environmental, population growth, economic development, and public works standpoint, there is a lot riding on the adequacy of an IRWMP. Now is not the time to try to figure out how little we have to do to minimally comply with the IRWM Guidelines. Now is not the time to see how many guidelines we can get away with ignoring or "finessing." Now is not the time to present sunny half-truths to the Department of Water Resources. Now is the time to comply with the IRWM Guidelines. Now is the time to tell the whole truth to DWR. It is that whole truth that best displays the region's need for help.

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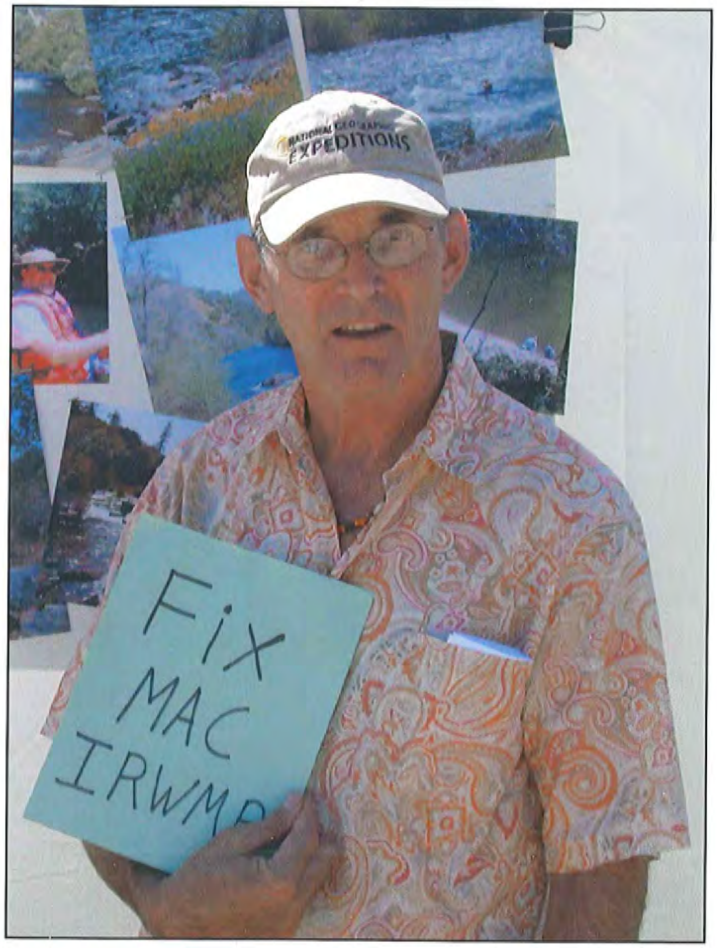
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Sincerely,

NAME	CITY/TOWN	EMAIL
Cynthia Creo	Fiddletown CA	creoflan@yahoo.com

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RANDY BERG	JACKSON	RANDY@FOOTHILLCONSERVANCY.ORG
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Cathy Ansel	Mountain Ranch, CA	

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Dennis Lewis	West Point	dellewis63@yahoo.com

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NAME	CITY/TOWN	EMAIL
Terry Goffinet	Railroad Flat	✓ newsletter! tgoffinet.gmail.com

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LEANNE BRYAN	Mountain Ranch	moosebr@usa.net

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Terry McBride	Mtn. Ranch	tmcbride@wildblue.net

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Bunny R. Allen		

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Patrick McCluskey	MTN RANCH	pfmac10@yahoo.com

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Teri Kurtz	Valley Springs	tskurtz@mwn.com

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Marti Crane	Valley Springs	crane@caltel.com

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Jim Van Saint	Valley Springs	3stjames@gmail.com

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NAME	CITY/TOWN	EMAIL
Kathleen [illegible]	Valley Springs	[illegible]

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Joy R	San Andreas	

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NAME	CITY/TOWN	EMAIL
CAROLINE SCHIRATO	ANGELS CAMP	CSchirato@aol.com

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Vicki Smith-Becker	Angels Camp CA	vlsbecker@aol.com

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Steve Lauterbach	Camp Connell	STEVELAUTERBACH@COMCAST.NET

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NAME	CITY/TOWN	EMAIL
Alfred J. Sickle	Murphys	X

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Constance Cook	Murphys	cecook19@gm
NAME	**CITY/TOWN**	**EMAIL**

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NAME	CITY/TOWN	EMAIL
Frank Gado	Murphys	fhgado@gmail.com

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NAME	CITY/TOWN	EMAIL
Ashley [illegible]	Murphys	cudreamer@hotmail.com
		cudreamer@hotmail

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NAME	CITY/TOWN	EMAIL
Merita Callaway	Murphys	meritaca

Advisory Committee
State Water Plan
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Comcast.net

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[illegible]	Murphys	mgeklasser@gmail.com

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NAME	CITY/TOWN	EMAIL
Kerry Keeney	Murphys	Kerry.Keeney@yahoo.com

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John Adams	Murphys	jadams2212@comcast.net

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RHODA NUSSBAUM MURPHYS		rhoda.nussbaum@gmail.com

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Kelly O'Geen	Vallecito	
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NAME	CITY/TOWN	EMAIL
Christa Ryan	Murphys	

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SHEILA M. GRANDSON	VALLECITO	SHEILA@CALTEL.COM
NAME	**CITY/TOWN**	**EMAIL**

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9) Commit to monitoring plan implementation.

Do not stop updating the plan until these tasks have been completed. We need a MAC IRWMP that complies with the IRWM Guidelines, and that can successfully compete for grant funds with the plans of other regions.

Sincerely,

JIM JARVIE	AVERY	jjarvie@goldrush.com
NAME	**CITY/TOWN**	**EMAIL**

FIX THE MAC IRWMP

October 1, 2012

Dear Ms. Wilcox,

I have the following comments on the Mokelumne-Amador-Calaveras Integrated Regional Water Management Plan (MAC IRWMP). Please pass these comments on to the Regional Participant's Committee. Please include these comments and the responses in the final MAC IRWMP.

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Sincerely,

NAME	CITY/TOWN	EMAIL
Jana Pisciotta	Murphys CA	jana.pisciotta@gmail.com

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NAME	CITY/TOWN	EMAIL
Lisa Garcia	Murphys	3laughoffen@comcast.net

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Sincerely,

NAME	CITY/TOWN	EMAIL
John A Kramer	Vallecito CA	Jlmkkramer@gmail.com

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Sincerely,

NAME	CITY/TOWN	EMAIL
C. L. King	Copperopolis, CA	lucky@caltel.com

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Sincerely,

NAME	CITY/TOWN	EMAIL
[illegible]	Copperopolis	gjacks@yahoo.com

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Sincerely,

NAME	CITY/TOWN	EMAIL
Nancy D. Brannon	Cameronopolis	RN.DEB@HOTMAIL.COM

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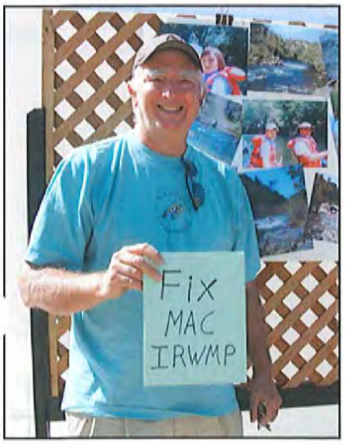
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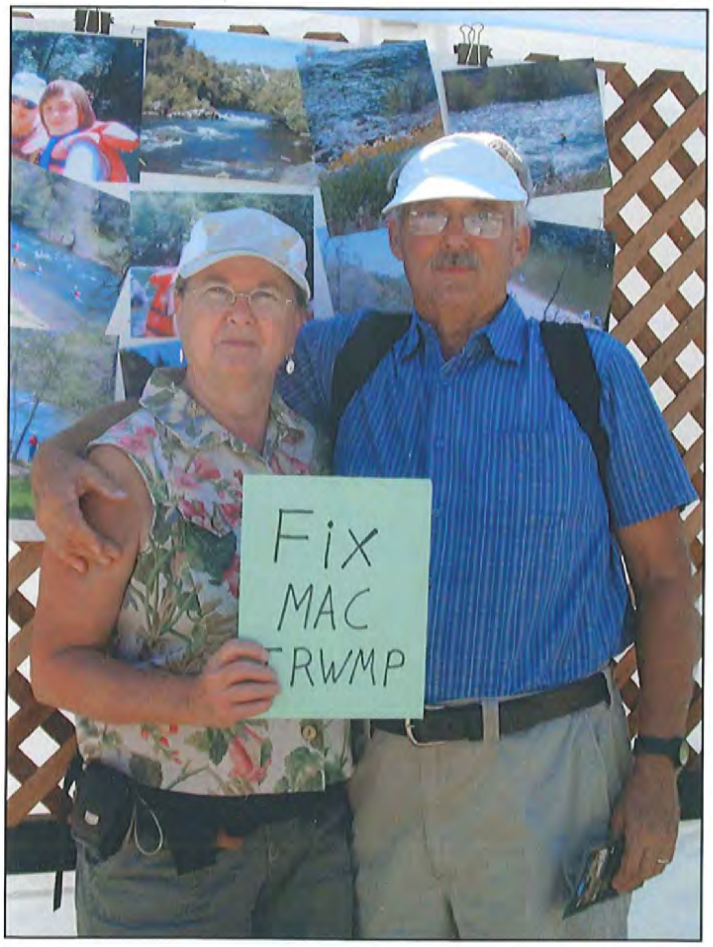
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Lindsey Wilcox

From: Alyson Watson
Sent: Monday, January 14, 2013 8:41 AM
To: Lindsey Wilcox
Subject: FW: MVS Comments on January 2, 2013 MAC CARWSP Report Public Draft
Attachments: ValleySprings_TSTMs_and_TPMs_20090819_Map.pdf; Northwest Calaveras_TSTMs_and_TPMs_20110511_E.pdf

FYI

From: Colleen Platt [mailto:cplatt1@comcast.net]
Sent: Saturday, January 12, 2013 6:25 PM
To: Alyson Watson
Cc: Tom Infusino; Muriel Zeller; robalcott@aol.com; april@ebmud.com
Subject: MVS Comments on January 2, 2013 MAC CARWSP Report Public Draft

January 12, 2013

Comments on January 2, 2013 MAC CARWSP Report Public Draft

To: Alyson Watson, Project Manager RMC
Cc: Rob Alcott, Executive Officer UMRWA, and Alyson Watson, Secretary
From: Colleen Platt, MyValleySprings.com
Re: Comments on the MAC CARWSP Report Public Draft

Alyson,

Tom Infusino on the RPC sent the report to us for our review and suggested we submit any comments to you directly. Thank you for considering our input.

Please accept the following comments on the CARWSP report draft. These comments are submitted by MyValleySprings.com, a Calaveras County-based community planning non-profit organization (www.MyValleySprings.com).

A. References to "the communities of Burson North and Burson South" incorrect

In section 2 Project Setting, Figure 1 Camanche Area, and in section 5.1 Areas to be Served, "the communities of Burson North and Burson South" are described. This is incorrect. **There are no communities called Burson North and Burson South--they do not exist.** There is only one

unincorporated community called Burson. Please don't invent communities that don't exist or divide those that do. This was probably a misinterpretation of roads and maps. Please remove North and South, and just refer to "the community of Burson."

B. Wallace Area demand figure based on 400 lots, unsubstantiated

Quotes from the report:

"Wallace currently consists of 100 units. It has a project demand (maximum day demand, or MDD) of 645,700 gpd for approximately 400 units, all of which are included on approved or tentative approved maps" [from pg. 21, under Alternative 3].

"Phase 3 – The Phase 3 facilities will solely serve CCWD's Wallace service area. Wallace now contains about 100 homes, with an additional 300 approved lots on which homes will likely be built over the coming years." [from pg. 29, under Financing]

The projection for a project demand of 400 existing and approved lots in the Wallace service area has *no data or projects referenced to back the number up*. We think these numbers are overstated, and question the accuracy of the numbers, the phrase "likely be built", and what is meant by "over the coming years."

MyValleySprings.com has been tracking developments since 2005. We have obtained current County residential project lists, and we have posted recent County development maps on our website. We are not aware of "an additional 300 approved lots on which homes will likely be built over the coming years." In fact, looking at project lists and maps, we can see only around 5-30 lots currently existing or approved on county maps within the Wallace service area. Much proposed development in the Wallace area has been denied, withdrawn, or has expired or gone through bankruptcy in recent years.

See the attached two Calaveras County Planning Department maps "Subdivisions and Parcel Splits in the Valley Springs Area", and "Subdivisions and Parcel Splits in Northwest Calaveras County." These maps show approved, pending, denied, expired, and withdrawn subdivision and parcel maps in the Wallace area. If there is no other data available showing the basis for the claim of an additional "300 lots", this should be changed to reflect existing lots and current development maps.

Note: "Appendix C – Boundary Map and Demand Projections Technical Memorandum" was not included in the Public Draft report, so we were not able to review. Please apply the comments above to any Wallace demand figures included in Appendix C (and to other Appendixes that include demand figures).

Thank you for the opportunity to review the draft and submit comments.

Respectfully,

Colleen Platt, Secretary
MyValleySprings.com
cplatt1@comcast.net

MyValleySprings.com
P. O. Box 1501, Valley Springs, CA 95252
email: myvalleysprings@myvalleysprings.com

Cc: Tom Infusino, Calaveras Planning Coaltion
Muriel Zeller, Calaveras Planning Coalition

Lindsey Wilcox

From: Alyson Watson
Sent: Friday, January 18, 2013 8:22 AM
To: Lindsey Wilcox
Subject: FW: MAC CARWSP Report Public Draft - Comments Due 1/17/13

From: Tom Infusino [mailto:tomi@volcano.net]
Sent: Thursday, January 17, 2013 4:09 PM
To: Alyson Watson
Cc: Rob Alcott; Lindsey Wilcox; april@ebmud.com
Subject: FW: MAC CARWSP Report Public Draft - Comments Due 1/17/13

Hi Allyson,

Given my extended illness, I asked Muriel Zeller and Colleen Platt from the Calaveras Planning Coalition to review the CARWSP project information and to prepare comments. Colleen indicated that she would send you her comments directly if she comes up with any. Muriel came up with the comments below and asked me to forward them to you.

I am also sending a copy to the UMRWA Board, as they will be taking action to adopt and implement the MAC IRWMP.

Thanks,

Tom Infusino, CPC Facilitator
RPC Member

From: Muriel Zeller [mailto:murielz@comcast.net]
Sent: Saturday, January 12, 2013 12:07 PM
To: Colleen Platt; Tom Infusino
Cc: JACKIENEILL@comcast.net; cathrynjackson@comcast.net; lmayhew@ainet.com; kmayhew@ainet.com; Joyce Techel
Subject: Re: MAC CARWSP Report Public Draft - Comments Due 1/17/13

I agree with Colleen that there are improvements, and I want to see Wallace have a viable water supply, but I do have some concerns:

Conjunctive Use: Regarding CCWD, "even with a combination of water conservation and surface water supply to the community of Wallace, CCWD would be expected to periodically require additional supplies in years with very low Mokelumne River streamflows (estimated to be approximately

4 months out of every 48 months, based on modeling performed by EBMUD). By using surface water in lieu of groundwater in months when surface water is available, CCWD would allow the groundwater basin to recharge, improving supply and quality for use in years in which surface water is limited." Recent USGS studies indicate groundwater recharge is not occurring at any appreciable rate in the west county, where, in some areas, groundwater is estimated to be between 2,200 and 13,400 years old. CCWD is currently in the process of analyzing data to assess recharge potential in the west county. If there is information on the rate of recharge for these existing wells that are to be used in conjunction with the surface water, it should be included in this study.

"Use of surface supplies in lieu of groundwater supplies in 44 of every 48 months, on average, would be expected to allow the groundwater basin to adequately recharge, correcting some of the existing supply and quality deficiencies experienced by the system and enabling use during months when surface supply is unavailable. Alternative 3 is the only alternative that achieves this CSF (critical success factor) by providing a reliable supply for Wallace." Beyond what "would be expected," I didn't see any documentation that sufficient recharge would, in fact, occur to "correct supply and quality deficiencies" and supply the existing (100) and approved (400, not yet built) Wallace homes for the 4 months without surface water.

In addition, "The groundwater in the areas surrounding CANS and CASS are problematic and would not allow for the extensive application of conjunctive use..." In short, I believe the extent of beneficial conjunctive use has been overstated in the Feasibility Study.

Coordination Among Multiple Water Agencies: "EBMUD plans to move forward with Phase 1. The portion of the project that would serve EBMUD's CANS and CASS areas is currently at 90% design and is expected to be constructed in 2013-2014. It should be noted that, while EBMUD currently plans to move forward with Phase 1, Phases 2 and 3 may not proceed if outside funding cannot be secured to offset implementation costs and minimize the burden to ratepayers in the Lake Camanche Village and Wallace areas." While AWA "intends" to move forward with Phase 2, a lack of funding may prohibit their intent. CCWD hasn't even "elected" to proceed with Phase 3. This project seems to be more about EBMUD than anyone else. There may be "coordination," but the primary beneficiary is EBMUD. Since this project is part of the MAC IRWMP, I think that needs to be clearly stated. As I heard at a CCWD board meeting, EBMUD is "in the driver's seat."

Land Use: In a county where the general plan coordinator is quoted in the newspaper as saying water supply issues will continue to "plague future development," and "We know water supply availability in parts of the county is being tapped down so far it's unsustainable," it is disingenuous to believe that any water supply project will not impact land use. As part of the MAC IRWMP, CARWSP is linked to various other water supply projects both inter- and intra-regionally.

Muriel

From: Colleen Platt
Sent: Friday, January 11, 2013 4:43 PM

To: Tom Infusino
Cc: murielz@comcast.net ; JACKIENEILL@comcast.net ; cathrynjackson@comcast.net ; lmayhew@ainet.com ; kmayhew@ainet.com ; Joyce Techel
Subject: Re: MAC CARWSP Report Public Draft - Comments Due 1/17/13

Hi Tom,

I'm just getting a chance to look at this document--sorry for the delay. The CARWSP project looks to be improved, at least from a Calaveras perspective. Total costs and CCWD's portion have gone down; Burson has been taken out of the areas to be served (they'll look to Jenny Lind for supply instead); the facility is sized to accomodate only approved development, and incorporates water conservation; and the Wallace area is in Phase 3 and will not proceed without outside funding, so as not to burden ratepayers.

If I find concerns I will send comments to Alyson Watson, Rob Alcott and April Hughes (unless you would prefer I send to you, Tom).

Colleen Platt

----- Original Message -----
From: Tom Infusino
To: murielz@comcast.net ; cplatt1@comcast.net ; JACKIENEILL@comcast.net ; cathrynjackson@comcast.net ; Bill Condrashoff ; lmayhew@ainet.com ; kmayhew@ainet.com ; Joyce Techel
Cc: Katherine Evatt ; pete@mokeriver.com
Sent: Thursday, January 03, 2013 1:41 PM
Subject: FW: MAC CARWSP Report Public Draft - Comments Due 1/17/13

Hi All,

1) If you have concerns regarding CARWSP that you want me to pass on to the Regional Participants Committee working on the IRWMP, feel free to send them to me and I will pass them on. Better yet, just send them in yourself to Alyson noting that I invited you to do so.

2) More importantly, you will probably want to address a copy of your concerns to the UMRWA Board of directors, who will be approving the IRWMP on January 25. They will also be asked to include the first phase of CARWSP as one of the three projects in the next grant package for the region. Rob Alcott (robalcott@aol.com) is their executive officer and their Secretary is April Hughes

april@ebmud.com

Tom Infusino

From: Alyson Watson [mailto:AWatson@rmcwater.com]
Sent: Thursday, January 03, 2013 9:56 AM

To: pete@mokeriver.com; mdaly@ci.jackson.ca.us; dean@goldrush.com; kke@foothillconservancy.org; tfrancis@ebmud.com; jgardner@ci.plymouth.ca.us; tomi@volcano.net; dleatherman@cpud.org; EPattison@ione-ca.com; gmancebo@amadorwater.org; tmcclung@fs.fed.us; jeffreym@ccwd.org; tnovelli@co.amador.ca.us; rschuler@volcano.net; gslade@sullygroup.com; donstump1@gmail.com; toyvin@amadorca.com
Cc: Rob Alcott; Karen Johnson (kejwater@aol.com); Lindsey Wilcox
Subject: MAC CARWSP Report Public Draft - Comments Due 1/17/13
Importance: High

RPC Members,

Please find the draft Camanche Area Regional Water Supply Plan (CARWSP) Feasibility Study attached. **Please provide your comments in track changes format no later than January 17, 2013.** For those of you who cannot open word files, I will be sending a pdf version, including all appendices, in a separate email due to filesize. The text included in Section 10 of the attached CARWSP Report, once revised, will be included in the MAC IRWM Plan Update before the existing Section 4.1.5 (becoming a new Section 4.1.5 and moving Considerations for Future Updates to a new Section 4.1.6). These documents will be posted on the webpage later today, along with copies of the meeting notes and public presentations made regarding CARWSP.

Please remember that there will be an extra, optional meeting of the RPC on **Thursday, January 10 from 3:00 pm – 4:30 pm at Amador Water Agency (Board Room)**, located at 12800 Ridge Road in Sutter Creek. The purpose of the meeting will be to walk through the draft CARWSP documents and discuss any questions or comments you may have. You are welcome to bring other interested parties from your organization to the meeting.

Thank you!
Alyson

Alyson Watson, P.E.
Senior Project Manager

RMC Water and Environment
222 Sutter Street, 7th Floor
San Francisco, CA 94108
Direct: 415.404.6442
Cell: 415.734.0049
Fax: 415.404.6544
awatson@rmcwater.com
www.rmcwater.com