

Letters or Comments Regarding This Plan

From: Richard Moss [mailto:rmoss@ppeng.com]
Sent: Wednesday, November 07, 2007 9:20 PM
To: Mirwald, Phil
Cc: ldotson@kdwcd.com; SOgletree@ci.visalia.ca.us
Subject: UWMP Mark Up

Hi Phil –

Here is what I compiled from the assignments given us on Monday. I appreciate everyone getting me their comments as assigned.

I believe these are the minimum in changes we would like to see in order to move forward with it's release on the limited time schedule Tom prescribed and with the intent of cooperatively redrafting the document in the coming year. We have not had the opportunity to go through and conform the entire document to the suggested changes. Hopefully you or Tom and staff will be able to do that.

While we clearly would have liked more time to comprehensively review and comment on this document, I can say on behalf of everyone involved that we appreciate Cal Water's willingness to consider these changes and look forward to immediately beginning working with you in the next generation of this document which we think can serve as a real tool in planning the City of Visalia's water future.

Please feel free to call any of us on the comments provided.

Dick

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Dick Moss

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3.1 Introduction

Recommend that this table be footnoted to say:

“Note: This table represents the anticipated production capacity of the current and planned wells within the Visalia District.”

3.4 Groundwater

Recommend that the following be added to the last paragraph of 3.4:

“The long-term trend of groundwater is a slow decline in water levels. This portends the potential of decreased available groundwater supplies at some point in the future (considerably outside of the planning horizon of this document) and possible additional costs of seeking groundwater at greater and greater depths in terms of well construction costs, as well as operation and maintenance costs. This potential is being addressed through a number of means including:

- The development and implementation of a regional groundwater management plan being coordinated by the Kaweah Delta Water Conservation District to which both Cal Water and the City of Visalia are both signatory.
- The collection of fees and charges by the City of Visalia to fund the purchase of additional surface water rights and groundwater recharge facilities to slow or eliminate the declining groundwater levels.
- The importation of additional surface water for recharge purposes by the Kaweah Delta Water Conservation District as facilitated by their becoming a long-term Friant Division Central Valley Project contractor.
- Additional actions such as water conservation activities are discussed elsewhere in this document.

As the average static groundwater levels are a function of regional and local conditions, future updates to this Urban Water Management Plan will detail actions to be taken regionally and locally to achieve a long-term balanced groundwater condition for the Visalia District.”

Recommend that Figure 3.4-1 reflect a 50 year period as noted in prior discussion of static groundwater levels.

3.4.2 Groundwater Management Plan

Recommend that the following replace Section 3.4.2:

“The groundwater basin that Cal Water pumps from is an un-adjudicated sub-basin almost entirely within the Kaweah Delta Water Conservation District’s (KDWCD) boundaries. As noted previously, Cal Water worked with the Kaweah Delta Water Conservation District, the City of Visalia and others to develop a Groundwater

Management Plan under the provisions of Assembly Bill 3030. The Kaweah Delta Water Conservation District is the lead agency in this effort. KDWCD has historically focused on the conservation of flood flows of the Kaweah River for groundwater recharge. While KDWCD is not currently a water supply contractor from the federally funded Friant-Kern Canal, it has historically obtained some water from that facility under surplus conditions and is in the process of obtaining a long-term contract with both a Class 1 and Class 2 water entitlement.

The groundwater management plan acknowledges a continuing decline in groundwater levels of the aquifers below the Visalia District. In an effort to assist in mitigating this groundwater decline, the City of Visalia recently passed a groundwater ordinance that establishes fees which are expected to fund groundwater recharge and other water resource projects within the City. The Groundwater Recharge revenues are derived from three fees: the Groundwater Recharge Fee, Groundwater Extraction Fee, and the Groundwater Mitigation Fee:

1. ***The Groundwater Recharge Fee*** was created on December 17, 2001 through an adopted Resolution 2001-09 which adds a fee for groundwater recharge as part of a cooperative agreement with KDWCD to increase groundwater recharge efforts. The fee is collected from the monthly City utility bill and is based on the size of the water service line. First priority of recharge fees is for the agreement with Kaweah Delta Water Conservation District for the acquisition of water and other activities to improve groundwater levels. This fee currently generates approximately \$180,000 per year. The portion of the fee that is not sent to KDWCD is available for use by the City to fund groundwater recharge efforts.
2. ***The Groundwater Extraction Fee*** became effective January 2006 and is charged to Cal Water or any provider of municipal water supplies, which include all residential, commercial and industrial water suppliers. This fee is \$14 per acre foot of water pumped.
3. ***The Groundwater Mitigation Fee*** became effective August 2005 and is charged to any person seeking to annex property. This fee is \$950 per acre of land to be developed, the assignment of appropriate water rights or a combination of the two.

All fees in this fund are to be used for acquisition of surface water rights and surface water supplies, groundwater recharge facilities, and other activities to improve groundwater levels and increase supply of water to the City.”

3.5 Recycled Water

Recommend that the following replace Section 3.5:

“The recycling of wastewater offers several potential benefits to the City of Visalia, as well as Cal Water and its customers. Perhaps the greatest of these benefits is to help

maintain a sustainable groundwater supply either through direct recharge, or by reducing potable supply needs by utilizing recycled water for appropriate uses (e.g., landscape, irrigation) now being served by potable water. Currently, no wastewater is recycled for direct reuse from the domestic or industrial wastewater streams in the District. The potential amount of recycled water that can be produced is proportional to the amount of wastewater that is generated by District, and is discussed in the following sections.

Outside of the Cal Water Visalia District service area, recycled water is utilized by the City of Visalia Waste Water Treatment Facility (WWTF) to meet irrigation water demands near the WWTF. Reuse of this water offsets groundwater use and ultimately benefits the same sub-basin which serves the Visalia District. The WWTF's collection system encompasses approximately 30 square miles. Tertiary treated wastewater is discharged to Mill Creek and to onsite disposal ponds for groundwater recharge, as well as delivered to 250 acres of fodder and fiber crops and a 650 acre walnut orchard immediately south of the WWTF for irrigation.”

3.5.3 Potential Water Recycling

Recommend that the following replace Section 3.5.3:

“Because the City of Visalia is approximately four miles east of the treatment plant, there currently are no plans to provide recycled water in Cal Water’s Visalia service area in the near future. The cost of transmission and distribution of recycled water has to date not been justified based on current and anticipated costs of water and of wastewater disposal.

This potential is being regularly reconsidered and reanalyzed. In particular, there is potential to irrigate the Valley Oaks golf course and Plaza Park near the treatment plant with treated water. The golf course currently utilizes private well water for irrigation and is not a customer of Cal Water. Additionally, the City of Visalia is reviewing as part of their East Downtown Plan, the installation of a new wastewater treatment facility in town which would intercept wastewater flows otherwise headed to the existing WWTF. These flows would be treated to tertiary standards for discharge into Mill Creek for groundwater recharge and for use on landscape and parkways in the new City core.”

3.7 Transfer or Exchange Opportunities

Recommend that the following replace Section 3.7:

“The participants in the previously mentioned groundwater management plan see the importation of additional surface water into the sub-basin as an important element to achieving a balanced groundwater condition. As has already been mentioned both the Kaweah Delta Water Conservation district and the City of Visalia are already or will shortly become the beneficiaries of contracts for water supplies to be developed and delivered by the federal Central Valley project. Besides the additional water to be delivered into the area as a contract entitlement, the status as a long-term contractor also

affords improved access to surplus federal water supplies that may be available from other federal contractors or which may be surplus to the federal project's overall immediate demands. Monies are being set aside by both Kaweah Delta Water Conservation District as well as the City of Visalia which would enable the purchase of such water supplies when they come available.

One such opportunity was recently presented by Cal Water. Cal Water has brought the opportunity to purchase water from an "outside-the-basin" water source. There is 10,000 acre-feet of water banked in the City of Bakersfield's groundwater bank, which is owned by Cal Water, can be made available over 5 to 7 years for extraction and ultimate delivery to the Visalia area via the Kaweah River and its distributaries for groundwater recharge.

In order to make the cost acceptable as recharge water, the water will be first delivered to citrus growers in Hills Valley Irrigation District (that can use and are willing to pay for the firm nature of this water) and they in turn will provide the City of Visalia and the Visalia District water in a future year at a cost of somewhere between \$25 and \$50 per acre-foot at a time when the City of Visalia otherwise does not have access to water at equivalent costs. Thus, the City of Visalia will be able to access 10,000 acre-feet of water it otherwise would not be able to purchase elsewhere at a net cost of somewhere between \$25 and \$50 per acre-foot."

3.8 Water Supply Reliability

Recommend that the following replace the third paragraph of Section 3.8:

"Because the source of supply in the Visalia District comes solely from an un-adjudicated basin, and not directly from impounded surface water runoff, the long-term reliability of supply relies on a number of regional and local factors. The short-term reliability of groundwater as a source of supply is excellent. In this case, total water supply availability (pumping capacity) figures have been used to determine reliability. Using such an approach assumes that there will be sufficient groundwater available during the planning term to meet anticipated needs. It is important to note that there has been a trend towards increasing depth to groundwater over the period of record, as seen in Figure 3.4-1. Using a projection of this trend, it is anticipated that water supply (pumping capacity) will decrease with the advance in time. A comparison between such changes in water supply versus future demands reveals that the supply will be adequate to reliably meet demands within the planning term.

It is understood that ultimately the reliability of the water supply to the Visalia District is function of the long term balance between aquifer replenishment and groundwater extraction. To better plan for ways to achieve this balance, Cal Water has teamed with the City of Visalia and Kaweah Delta Water Conservation District in the development of a numerical groundwater model, specifically focused for the Visalia District. The model will be utilized for several applications including, but not limited to, assisting in the land use decision-making process, analysis of various recharge opportunities to determine the

most effective strategies, and the determination of a practical rate of withdrawal in the future. As has been previously mentioned, with the implementation of this cooperative effort of measures, activities and projects, it is anticipated that a long-term balanced groundwater condition can be achieved.”

4.1 Worst Case Water Supply Availability

Recommend that the following replace Section 4.1:

“The Visalia District’s groundwater source is from an un-adjudicated ground water basin. Based on the assessment of water supply reliability, it is anticipated that the Cal Water will be able to supply its customer’s full service demand. The most likely threat is due to a serious prolonged drought, which could potentially reduce aquifer water levels to below current well depths, reducing pumping volumes, potentially force adversely affected wells out of service and increase the cost of well operation. In no case is there foreseen the potential of not being able to meet demands of the Visalia District.

7.2 Water Conservation Best Management Practices

Recommend to add the following after the Table 7.2-1:

“In addition to Cal Water BMPs, the City of Visalia has its own water conservation education program and a new department has been added to assist in conservation efforts. With this in mind the City of Visalia’s Natural Resources Conservation Department has added personnel to further educate the community and expand its outreach and education programs. Some of the arenas for education development are school and organizational meetings; City sponsored events; public service announcements and through several forms of advertising; and assisting with conservation programs for the commercial and industrial base.

The City of Visalia has also been proactive in establishing all City buildings erected or renewed from 1999 on with energy and water efficient systems. City planner’s work with commercial building developers on new and regentrification construction to install energy and water saving devices such as lavatories and toilets in their plans. Natural Resource personnel are educating the residential developers in the practices of xeriscape methods; low water usage plants and grasses for both common areas and residential housing.”

The City of Visalia has also modified ordinances to assist in reducing water wasters thru education, and the adoption of penalties and fines as part of an Administrative Citation process.

These City programs are conducted both, in cooperation with, and in addition to Cal Water’s existing and future programs.



October 11, 2007

Thomas Salzano, Water Resource Planning Supervisor
California Water Service Company
1720 North First Street
San Jose, California 95112-4598

Re: Visalia District 2007 Urban Water Management Plan

Dear Mr. Salzano:

The City of Visalia (City) has completed an initial review of the California Water Service Company's (Cal Water) Draft 2007 Urban Water Management Plan (UWMP).

The City believes this is an important document that outlines the water future for the City and its residents and businesses. As such, we believe it is important to take the necessary time to make sure this document accurately anticipates the long-term sustainable water resources for meeting the needs of the City as well as reflecting appropriate approaches to meeting those needs. Further, we believe that this document should be developed in conjunction with the City of Visalia as compared to just allowing the City to provide comment. We truly believe that the provision of long-term sustainable water supplies to the residents of Visalia is to be taken on as a partnership between City government and Cal Water. **As such, we request that this initial draft document be withdrawn and the City be allowed a more direct role in its redrafting.** While the current draft can serve as the basis for subsequent drafts, we believe there are significant problems in the current draft that warrant additional collective thought as to how they can best be addressed.

We can provide more specific comments on various sections of this current draft of the UWMP but believe it is our collective best interests to pull the current draft from public review and address our concerns more holistically regarding the overall document.

Please feel free to give me a call or the City's Division Manager for Natural Resources, Shawn Ogletree, to discuss how we might be able to collectively proceed.

Very truly yours,

A handwritten signature in black ink, appearing to read "S. M. Salomon".

Steven M. Salomon
City Manager
City of Visalia

cc: Visalia City Council
Phil Mirwald, California Water Service Company, Visalia
Rob Guzzetta, California Water Service Company, San Jose



September 25, 2007

Thomas Salzano, Water Resources Planning Supervisor
California Water Service Company
1720 North First Street
San Jose, California 95112-4598

Re: 2007 Urban Water Management Plan

Kaweah Delta Water Conservation District (KDWCD) acknowledges receipt of California Water Services Company's Draft 2007 Urban Water Management Plan (UWMP) for the Visalia District. In response to your request for review, KDWCD hereby submits our comments.

KDWCD recognizes that municipal and industrial water supply for the Visalia District is exclusively provided through the extraction of groundwater within and surrounding the District. KDWCD monitor's groundwater levels and has confirmed that the groundwater basin is in a state of overdraft.

KDWCD's would request that Cal-Water consider that the UWMP recognize this condition and address the supply of water resources in term's of "Safe Yield". Safe Yield can be defined as follows:

- a. The rate at which water can be pumped from wells year after year without decreasing groundwater in storage to the point where pumping lift would become economically unfeasible or where water of poor quality would begin to intrude into the reservoir.
- b. The amount of naturally occurring groundwater that can be economically and legally withdrawn from a basin on a sustained basis without producing an undesired result.

In regards to the above subject, we would suggest that your company consult with the City of Visalia to address the matter of Safe Yield within the UWMP in order to meet city objectives.

KDWCD presently knows of several resources that would facilitate quantifying Safe Yield for the Visalia District and such data is available to assist your organization in this effort. Beyond this conceptual consideration, KDWCD has more specific comments regarding possible compositional errors to the UWMP. If so requested a detailed review can be made available upon request.

Please contact me if you have any questions or comments in regards to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Dotson".

Larry Dotson, RCE
Senior Engineer



CALIFORNIA WATER SERVICE COMPANY
1720 NORTH FIRST STREET • SAN JOSE, CA 95112-4598 • (408) 367-8200

July 16, 2007

City of Visalia
Andrew Benelli, Director of Public Works
707 West Acequia Avenue
Visalia, CA 93291

Dear Mr. Benelli,

Please find attached a draft copy of California Water Service Company's 2007 Urban Water Management Plan for the Visalia District. This plan, as required by the California Water Code §10644(a), is made available to cities and counties within the district service area for review and comment. Cal Water intends to provide the final form of the plan to the California Department of Water Resources on or before December 31, 2007. The review and comment period of this plan will end at close of business on September 28, 2007.

This Urban Water Management Plan is a foundation document and source of information for a Water Supply Assessment and a Written Verification of Water Supply. The Urban Water Management Plan also serves as a long-range planning document for water supply and can be a source document for cities and counties for the preparation of the General Plans. Review of this plan will benefit both of our organizations.

Please acknowledge that this report has been received and reviewed. Send any comment or question to my attention:

Thomas Salzano
Water Resources Planning Supervisor
1720 North First Street, San Jose, CA 95112
(408) 367-8340 (phone) (408) 367-8427 (fax)
tsalzano@calwater.com

Thank you for your time,

A handwritten signature in black ink that reads "Thomas A. Salzano". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Thomas A. Salzano
Water Resources Planning Supervisor



CALIFORNIA WATER SERVICE COMPANY
1720 NORTH FIRST STREET • SAN JOSE, CA 95112-4598 • (408) 367-8200

July 16, 2007

Kaweah Delta Water Conservation District
Larry Dotson, Senior Engineer
2975 North Farmersville Blvd
Farmersville, CA 93223

Dear Mr. Dotson,

Please find attached a draft copy of California Water Service Company's 2007 Urban Water Management Plan for the Visalia District. This plan, as required by the California Water Code §10644(a), is made available to cities and counties within the district service area for review and comment. Cal Water intends to provide the final form of the plan to the California Department of Water Resources on or before December 31, 2007. The review and comment period of this plan will end at close of business on September 28, 2007.

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Please acknowledge that this report has been received and reviewed. Send any comment or question to my attention:

Thomas Salzano
Water Resources Planning Supervisor
1720 North First Street, San Jose, CA 95112
(408) 367-8340 (phone) (408) 367-8427 (fax)
tsalzano@calwater.com

Thank you for your time,

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Thomas A. Salzano
Water Resources Planning Supervisor



CALIFORNIA WATER SERVICE COMPANY

1720 NORTH FIRST STREET • SAN JOSE, CA 95112-4598

(408) 367-8200

August 30, 2007

Kaweah Delta Water Conservation District
Larry Dotson, Senior Engineer
2975 North Farmersville Blvd
Farmersville, CA 93223

Dear Mr. Dotson,

Per your request, please find enclosed a draft CD copy of California Water Service Company's 2007 Urban Water Management Plan for the Visalia District. As reminder, Cal Water intends to provide the final form of the plan to the California Department of Water Resources on or before December 31, 2007. The review and comment period of this plan will end at close of business on September 28, 2007.

Please acknowledge that this report has been received and reviewed. Send any comment or question to my attention:

Thomas Salzano
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(408) 367-8340 (phone) (408) 367-8427 (fax)
tsalzano@calwater.com

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A handwritten signature in black ink, appearing to read "Thomas A. Salzano", written over a large, stylized flourish.

Thomas A. Salzano
Water Resources Planning Supervisor