



**LAKE DON PEDRO
COMMUNITY
SERVICES DISTRICT**

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General Manager
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Office Supervisor
Syndie Marchiesiello

Operations Supervisor
Randy Gilgo

Mailing Address:
9751 Merced Falls Rd
La Grange, CA 95329

Phone: (209) 852-2331
FAX: (209) 852-2261

www.ldpcsd.org

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Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814-0100



Dear Ms. Townsend,

We appreciate the opportunity to comment on the amendment to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Draft Revised Substitute Environmental Document (herein referred to as SED). We understand and appreciate the State Water Resources Control Board's (Board) charge of amending this important plan, but at the same time must respectfully point the Board's attention to several critical flaws in the SED.

Unimpaired Flow Standard is Flawed

Establishing arbitrary unimpaired flow standards as a means of improving salmon recovery in the Delta is an unproven practice that even the most experienced of scientists cannot support as a means for habitat improvement. According to Board staff, the 40% unimpaired flow standard is a compromise that attempts to balance water supply reliability and salmon restoration.

This method of regulation, while fairly simple to enforce by the Board, will produce an unknown impact on salmon coupled with the absolute negative impact on local water supplies with reduced water storage, especially in drought.

Impact to Regional Drinking Water Systems

The vast majority of the Sierra Nevada Foothill communities were able to develop as the result of development of surface water supplies. Most of these communities have water rights dating back over 100 years. These communities rely almost exclusively and many of which are self-sustaining on surface water supplies they have developed through investment of millions of local dollars. Groundwater is not an option to sustain these communities in the short or long term while lake levels drop drastically to support

Impact to Lake Don Pedro CSD

The Lake Don Pedro Community Services District (LDPCSD) serves a population of 3500 and derives the majority of its water supply under contract with the Merced Irrigation District, through a diversion on Lake McClure. LDPCSD diverts less than 600 acre feet of water annually from a pumping system that can operate as the lake level drops down to an elevation of 710 feet above sea level (ASL). Below this elevation, emergency floating pumps are launched which pump to the lake's high water mark, where booster pumps transfer the water to a water treatment plant.

The emergency pumps can operate down to an elevation of approximately 560 feet ASL, a low level nearly reached in early 2015 when the lake dropped to 588 ASL before filling slightly with storm inflows. Below 560 ASL, the remaining Lake McClure water is miles away from the LDPCSD intake pumps. As a result in 2015 LDPCSD worked rapidly to secure emergency grant funding to construct three groundwater wells to support the human consumption, sanitation and

firefighting water needs of the community. LDPCSD implemented drastic water conservation measures and customers responded with a consistent 50% reduction in water demand for over one year. Due to the hard rock environment in which LDPCSD is located, locating adequate groundwater is extremely problematic. Over 13 test holes had to be drilled to find two wells that produced a maximum of between 70 and 110 gallons per minute.

Through this year long, \$2 million effort to build wells, LDPCSD was able to develop adequate water supply to meet 50% of its average water demand for short emergency periods in which surface water was unavailable. Through extensive testing conducted by a Certified California Hydrogeologist, it was determined that the new emergency wells could perform for up to a maximum of six months before groundwater levels in the wells could no longer safely pump without water depletion. No aquifer exists and additional groundwater identification in our service area is unlikely. In this rock environment, deepening well or installing larger well pumps, as detailed in the SED as a solution to lack of access to surface water, is not an option in LDPCSD.

According to Board staff, in critically dry years it is expected that Lake McClure will be up to 25% lower than it has in past years of similar water years. In years such as 2015, any level of mandatory increase in reservoir outflow from McClure would have outstripped any current or future groundwater capacity in LDPCSD and resulted in widespread local water outages not due to lack of water availability, but the result of water discharged under a mandate in hopes of supporting restoring 1000 salmon to the river system.

Impact to Regional Groundwater Supplies

During the recent severe drought period, hundreds of local private and public groundwater wells went dry, leaving many relying on imported supplies trucked in and stored in plastic tanks. If local surface waters are less available due to lower lake levels caused by higher outflows, local groundwater pumping will certainly increase further exacerbating the local groundwater well failures. With no groundwater aquifer, and unknown quantities of water stored in the hardrock fissures, use of groundwater supplies by the local communities including LDPCSD as the sole source of water supply is not a viable option.

Conclusion

The SED must be rejected by the Board and a proper evaluation completed on the impacts of lower reservoir levels on the primary water supply for Sierra Nevada foothill communities. The evaluation must consider the lack of groundwater supply availability in communities well established using surface water rights and lacking the ability to deepen wells or install larger well pumps.

The Board must approve solutions for the Delta that balance all needs for surface water supply, and communities such as LDPCSD which has no adequate groundwater must have access to surface water to survive.

We appreciate your consideration and please contact us if you have any questions.

Sincerely,



Danny Johnson
President, LDPCSD Board of Directors

cc: Hicham Eltal, Water Resources Manager MEID