

To: Mimi Morris, General Manager, Rancho Murieta CSD
cc: Amelia Wilder (for inclusion as board correspondence)

The River Valley Times therivervalleytimes.com recently reported the CSD Board of Directors will revisit data presented in the 2024 Integrated Water Master Plan. We eagerly await an explanation of how this audit will be conducted as both the data and suggested mitigation remedies are questionable. *Preliminary data suggests our district's reservoir storage does not support a development planning 4,000 residential dwellings and a population exceeding 9,500.* The data expose our inability to provide a sustainable and reliable supply of water in drought years and the curtailment of diversions of raw water from the Cosumnes River. The most recent of these curtailments occurred in May 2022.

Maddaus Water Management identifies several mitigation measures and suggests one or a combination of these options will reward Rancho North Properties with adequate water for 697 residential dwellings in its eight villages. It also promises the necessary water to develop a 39 acre parcel on the south side of Highway 16. These options are:

1. Converting Lake Clementia to a potable source of raw water and a backup water supply: This presents water permit, water licensing and water quality issues that cannot be routinely resolved. Additionally, residential development above Clementia's shoreline will reclassify hundreds of acre feet of natural drainage, converting this runoff to urban stormwater. A 1979 water order mandates CSD maximize the use of local runoff and drainage to decrease the demand on the Cosumnes River. This mitigation option does exactly the opposite. The District may also be required to seek an amendment of Lake Clementia's recreational water license and/or be required to amend its primary water diversion Permit 16762. Absent these amended permissions, CSD cannot consider the Clementia option in its water plan. This controversial option creates a significant possibility protest, opposing any application to amend CSD's existing permits and licenses. Securing amendments to permits and licenses is time consuming, expensive and presents no guarantee of success.
2. Drilling three to five "augmentation wells" is suggested as a mitigation option in Phase 3 of the CSD Story Map. It does not acknowledge that

there is no guarantee that groundwater augmentation will prove successful. Drawing water from up to five wells, yielding 1,200 gallons per minute, will extract 795 acre feet of water from the groundwater basin in a single month. The groundwater required to support a community emergency and the length of time pumping must continue to meet a total emergency water demand remain undiscussed and unidentified. CSD has attempted no formal communication with the Cosumnes Groundwater Authority to discuss approvals or permits required to implement a groundwater augmentation program. The long term impact of groundwater demands of this magnitude is unclear. History suggests that CSD's demand for "emergency" water in a sustained drought may continue for more than one year. Groundwater depletion, water treatment, manganese, arsenic and infrastructure issues remain unknown, as does the overall water quality of the basin. The impact of wells on the riverbed may prevent use of existing test wells which lie adjacent to the river. Should groundwater become available, the engineering consultant does not discuss the infrastructure required to process this water and deliver groundwater to residential users. How will well water extracted several miles from existing water treatment be integrated into our delivery system? Who will pay for this infrastructure? As with the use of Clementia, groundwater, remains an unperfected option.

3. Maddaus suggests the use of a 75 year old water license permitting 450 acre feet of water to be diverted from the river in summer months. This license was owned the Granlees family at a time when warming, licensing and demands on the Cosumnes were very different. Seasonal flows on the river often do not support seasonal diversion from the river and this "irrigation only" license allows only an (inadequate) 70 acre feet of storage. Maddaus and the CSD also appear to discount a legal entitlement to recycled water, granted by CSD to the the Rancho Murieta Country Club in 1988. This agreement assigns RMCC a priority to CSD's recycled water for golf course irrigation. How does this priority entitlement impact a suggested option to replace recycled water with river water as the source to irrigate two golf courses?
4. Historically, RMCS D water plans have proposed high levels of emergency conservation at times when the Cosumnes cannot provide a sustainable supply of raw water. This drought plan comes at the expense of the existing residents and the water saved by mandatory, reduced consumption is used to "credit" the available water supply. The use of mandated conservation as a "planning tool" is evident in the

2016 Water Supply Assessment (WSA); this “tool” was critical to the plan’s conclusion, that water was available to support full buildout of the community. Current data gathered by Maddaus sunshines the inaccuracies of the 2016 WSA. CSD is fortunate the County was convinced to replace the 2016 WSA. It is now clear this report was promising water CSD might not have.

5. The 2024 plan promises a radical increase in recycled water, created by proposed development and an (unsubstantiated) increase in commercial users. The District must audit and correct this calculation. The District annually processes 475 acre feet of recycled water and it cannot mathematically and/or physically generate 950 acre feet of water as is forecast in the current water plan.

Each of the mitigation and augmentation options discussed in the RMCS D Water Story share a common theme *They are all assumptions. None of the suggested options are vetted and some may require new permissions from the State.*

The misguided use of radical conservation policies to enhance the total water supply is the only option guaranteed to perform. Perhaps this why our previous water plans have consistently used the burden of conservation (on the existing residents) to justify new development.

CSD, from the beginning of this IWMP, has reacted as if it must act quickly to publish a completed plan. The CSD President has been quoted in this article that he is confident that the board will finish the 2024 IWMP “by the end of this year.” The District appears unaware of the current status of the Rancho North development application filed at the County of Sacramento in 2014. This ten year old application to develop 697 homes lacks the water, sewer and drainage studies required of the developer. These studies are reviewed by CSD and these reviews must be forwarded to the County. The review of these three studies will contribute significantly to the ability and costs to develop in the areas adjacent to the river and surrounding our reservoirs. Without a clear picture of the completed infrastructure, both a completed Integrated Water Master Plan and Water Supply Assessment remain premature.

We look forward to a timely and detailed explanation of how the District plans to proceed.

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Community member since 1985
Past President, Rancho Murieta CSD 2004-2006
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