

Janis Eckard  
15417 De La Cruz Drive  
Rancho Murieta, Ca. 95683  
[janiseckard@ranchomurieta.org](mailto:janiseckard@ranchomurieta.org)  
(916) 799-2745 Cell  
(916) 354-2745 Home

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Board Members, Ms. Mimi Morris (General Manager) and Mr. Michael Fritschi  
Rancho Murieta Community Services District  
P. O. Box 1050  
Rancho Murieta, Ca. 95683

Dear Board Members, Ms. Mimi Morris and Mr. Michael Fritschi,

At the last Board meeting, I felt there was a better understanding of the water situation. My statements that Rancho Murieta has insufficient water (for future development) is and always has been based on hard facts and has never been a fabricated attempt to shut down development.

This letter recaps - some - of the reasons I believe the IWMP assumptions are unachievable.

**Assumption #1 - Lake Clementia is a source of drinking water.**

- A) Lake Clementia is NOT presently permitted to be used as a source of public drinking water. Lake Clementia's Permit #16765 clearly states "Recreational Usage." It also says, "After the initial filling of the reservoir, licensee's right under this license extends only to water necessary to keep the storage reservoir full by replacing water lost by evaporation and seepage, and to refill if emptied for necessary maintenance or repair."
- B) Even Rancho Murieta's Permit for Diversion and Use of Water Permit #16762 does not allow storage in Lake Clementia (per Section 5A), if CSD fills the other lakes.
- C) The State Water Resources Control Board, has a large number of new and existing permit applications, awaiting review. Any license change could take years. Due to the fact that the state is requiring water districts to reduce usage, how likely is it that this change will be approved? How safe is it to rely on Lake Clementia, for future development, when you don't know if Lake Clementia's domestic water usage will ever be permitted?
- D) When Lake Clementia was initially built, down-stream farmers, etc. blocked the domestic potable water usage of Lake Clementia. Those entities felt domestic usage would deplete critical water, they needed. With greater demand and reduced supplies, now, isn't it likely those downstream entities might attempt to block expanding Lake Clementia's usage, again?
- E) CSD's past studies state that Lake Clementia is fed almost entirely by runoff, resulting in poor water quality that the existing treatment plants may be unable to process, without costly upgrades.
- F) Per the Department of Public Health, if the CSD is able to alter Lake Clementia's water permit to allow potable water usage, body water contact recreations would most likely have to be prohibited. How would this usage change impact the community?

### **Assumption #1 - Lake Clementia is a source of drinking water. (Continued)**

- G) CSD's Permit For Diversion And Use Of Water #16762, Condition #30 states: "Permittee shall make all reasonable effort to collect local runoff to storage to the extent local runoff is available in lieu of diverting water from the Cosumnes River." The developer plans to build homes around Lake Clementia (on terrain that slopes towards the lake). Lake Clementia is currently fed almost entirely by runoff. If Lake Clementia becomes part of RM's drinking water supply, how will CSD prevent urban runoff contamination and comply with this permit requirement?
- H) There's no infrastructure in place to transfer this water to the treatment plant.
- I) Last year, CSD completed drone surveys of Lake Calero and Lake Chesbro. The new surveys revealed that all prior CSD studies overstated the storage capacity of both lakes. Lake Clementia's original survey was completed at the same time as the other surveys. Isn't it logical to conclude that the capacity of Lake Clementia may be inaccurate, as well? Lake Clementia's water should not be included, let alone the capacity overstated.

### **Assumption #2 - Using Recycled water for new and existing homes with the Rancho Murieta Country Club served by raw water.**

- A) CSD has a contractual obligation to provide recycled water to the Rancho Murieta Country Club. The RMCC's current recycled water needs exceed the current supply during normal and dry conditions. In other words, there is NO excess supply (except during heavy rainfall years - when the Van Vleck spray fields are utilized). How can the CSD arbitrarily, legally break this contract? Even a study assuming ALL FUTURE development will use recycled water, would be mathematically impossible to achieve. There's currently a supply shortfall and it takes two homes potable water usage to generate enough recycled water to irrigate one lot. Also note worthy, drought conditions decrease recycled water supplies.
- B) The study states that CSD is currently generating 437 Acre Feet of recycled water annually and has a projected 955AF future system supply. How is this claim mathematically possible? The proposed development does not double the size of the community, so how can the recycled water supply more than double?
- C) The study "future system supply" total of 955 AF, has a qualifier: "(average precipitation years)". The study is a drought analysis. How can the study assume an average precipitation year supply when analyzing a drought?
- D) There is no infrastructure in place to supply current residents with recycled water. Wouldn't the cost to facilitate this change be astronomical?

### **Assumption #3 - Groundwater Well(s) Back-up Supply**

- A) On-site wells have been studied and deemed unfeasible, in Rancho Murieta. A Rancho Murieta CSD 1988 well study states, "Rancho Murieta is underlain by Mesozoic metamorphic rocks which have little to no potential for ground water development." The study goes on to say, "Based upon the noted geologic seating in the vicinity of Rancho Murieta, and the lack of deep alluvium in the region, it is recommended that ground water development be restricted to the shallow alluvium along the Cosumnes River." However, the Department of Public Health has warned that if a well is located close to the river and found to contain river water, those findings could violate Rancho Murieta Cosumnes River surface water pumping permit and could lead to revocation.

**This study is missing critical analysis. It does not address the declining health of the Cosumnes River and how river flow changes could directly impact Rancho Murieta's ability to pump water. The Cosumnes River is Rancho Murieta's only source of water. Isn't this omission significant?**

Rancho Murieta's water permit contains minimum Cosumnes River flow requirements and prohibits pumping unless there is a continual visible above-ground flow from the Michigan Bar pumping station - located near Rancho Murieta - to the McConnell pumping station, located near Highway 99. Ground water depletion is forcing the river to flow underground in a least two locations between these two stations. Additional future downstream development will exacerbate this problem.

Per the Nature Conservancy: "One of the findings of research on the Cosumnes over the past decade is that the Cosumnes River has been significantly impacted by groundwater withdrawal over the past century. Reports of conditions at the beginning of the last century show that the Cosumnes was at that time a "gaining" river, or one that received input of water from groundwater. With the creation of the Elk Gove and Galt area "cones of depression" the Cosumnes has increasingly become a "losing" river or one that loses surface flow to groundwater. A consequence of this change is the river ceases flowing earlier in the year, stays dry longer into the Fall, and drier over an increasingly long reach compared to historic conditions. Because the number of days that the river is dry each year has increased over time it takes significantly more surface flow from the upper watershed to connect the Cosumnes River to the Delta."

**Unlike most districts, Rancho Murieta does not have an emergency water supply and has been without a backup supply ever since the original plan failed during the 1976-1977 drought. This study must be accurate and contain achievable assumptions.**

Don't hesitate contacting me, if you have any questions.

Sincerely,

Janis Eckard