

Appendix S Public Comments and Responses

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Comment Number	Date Received	Commenter	Report Commented On	Comments	Date Replied	Response	Comments Incorporated into UWMP?
1	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Sec. 1.1 states that the <i>Long Term Water Needs and Supply Study</i> will assess the effect of Wild and Scenic River designation on the agency's future water supplies. We don't recall that being cited as the original purpose of the study, although the demand piece was certainly linked to the agency's desire to provide information to inform the state-mandated AB 142 study. In their original presentation on the study, RMC erroneously assumed that a number of projects would be precluded by WSR designation because they clearly don't understand the law or how it's implemented. So we are concerned that the study is now being described as a wild and scenic analysis rather than a demand analysis.	6/2/2016	The purpose of the Long Term Water Needs and Supply Study is to analyze the Agency's potential future demands and supplies. The Agency's future water supply may be affected by factors such as Climate Change and Wild and Scenic Designation on the Mokelumne River, so the impact of these factors will be included in the Study.	No
2	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Also in 1.1 , the draft cites various gallons per capita day figures used in the document. In the MokeWISE process, AWA and all other agencies agreed to use 85 GPCD as a baseline for water consumption. Why isn't AWA using that agreed-upon figure here and elsewhere in the document? At a minimum AWA should develop a range of demand that uses that number as the low end of the demand range. <i>(Also cited 85 GPCD in comments for sections 5.1 and 5.3)</i>	6/2/2016	The 85 GPCD stated in MokeWISE was a theoretical maximum level of conservation used to analyze potential conservation efforts, not a level of use projected into the future. In the final MokeWISE report, see page 227: "It was made clear that this maximum theoretical level is not something that is being advocated for at this point, but that is acting as a reference point to examine what is theoretically possible" and page 412: "This gpcd number is presented to provide a theoretical maximum of estimated conservation savings. It is understood that to achieve 85 gpcd, significant funding and public outreach and education would be needed". The MokeWISE GPCD was not calculated using the DWR required methodology for UWMP and represents only possible residential potable water use, not overall retail service area water use as required by DWR. The GPCDs referenced throughout the UWMP are calculated using DWR's methodology; the baseline is estimated using actual AWA historical water use data and the targets are calculated using approved methodologies developed by DWR for the purposes of complying with SBX7-7. At a minimum, AWA will reduce its urban water use to achieve these targets.	No
3	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Sec. 2.5.3 states that Foothill Conservancy was sent written notification of the draft's availability more than 60 days before the May 12 hearing. We never received that notification and only learned of the UWMP on Friday, May 5.	6/2/2016	The Agency attempted to send Foothill Conservancy a written notification of the draft's availability, but sent the notification to the Conservancy's old address. The CA Water Code requires urban water suppliers notify cities and counties in the service area of the UWMP preparation, public hearing and adoption. AWA also selected to inform other stakeholders, including Foothill Conservancy in an attempt to keep these parties well informed. The Conservancy's new address is now on file.	No
4	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Sec. 3.3.1 states that "many of the dams" in the county are operated for flood control. This is not true. The only dam in the Mokelumne system operated primarily for flood control is Camanche Dam.	6/2/2016	See edits to text: removed reference to "many of the dams".	Yes
5	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Page 3-6, paragraph 4 includes a statement related to flow management and EBMUD's water rights. That's irrelevant to AWA because it relates only to the Mokelumne downstream of Camanche Reservoir. The reference to PG&E's FERC license should also include "and a related, legally binding settlement agreement" in the language. There is also a rather confusing statement in this same paragraph related to the PG&E flow regime and AWA. Can that be explained better? We're not sure what it means.	6/2/2016	See edits to text: removed statement regarding EBMUD and added language regarding FERC settlement agreement.	Yes

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6	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	The Hydropower section on page 18 includes both misleading and speculative statements as they relate to the Mokelumne River. PG&E's Project 137 is not operated to meet local demands. In addition, the state does not consider power from large hydro projects to be renewable, so as utilities strive to meet the requirements of the Renewable Portfolio Standards, they will not be doing so with large hydropower projects.	6/2/2016	See edits to text: removed "renewable" from language.	Yes
7	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Section 3.4 mentions including approved subdivisions when calculating future demand. While this may be prudent, some of these subdivisions are unlikely to ever be developed. Continuing to "bank" water for them may not be the best path forward, so you may want to do some research into the likelihood of some of the larger projects moving forward. AWA cites Amador County's Housing Element as the source of its population projections. The updated 2009-2014 Housing Element uses 2007 Department of Finance projections. The latest DOF projection (2016) shows the county will add only 5,728 residents through 2060. That's a 15 percent increase in 44 years, not the 5-7 percent per decade used in this report as a basis for future demand calculations. In addition, the Draft Environmental Impact Report for Amador County's General Plan, released in 2014, used 2013 DOF projections in its section on Population and Housing (DEIR, Table 4.12-1, p. 4.12-2). We recommend AWA revise its population projections using the most current DOF projections to better inform its discussion on population and demographics. See http://www.dof.ca.gov/research/demographic/projections/documents/P-1_Total_CAProj_2010-2060_5-Year.xls (Also cited DOF projections for Table 4.4)	6/2/2016	AWA has chosen to use the County's adopted housing element to maintain consistency with other planning agencies in the county. The 2014-2019 Housing Element used in this UWMP was adopted in July 2015 and uses 2013 DOF data as the basis for population projections. The planned developments that are listed and mapped in Appendix C are considered to be near-term developments and are thus considered in demand planning because they have either will-serve or conditional will-serve agreements with AWA, have approved tentative parcel maps, or are active projects. These developments support the total population increase expected by 2040 stated in the 2013 DOF projections.	No
8	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Table 4.1: Why is Mule Creek's use considered residential, not institutional?	5/31/2016	See edits to text: corrected error and changed to Institutional	Yes
9	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Table 4.2: The system loss figure in Table 4-2 does not match other system loss figures in the report (for example, second paragraph of Section 4.2 states 2015 losses at 2,116 AF). Please ensure consistency throughout.	5/31/2016	See edits to text: updated text to match table and other references	Yes
10	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Section 4.1.2 assumes that future per-household residential demand will be similar to the years 2010-2012 and remain the same over time. This is inconsistent with the demand projections being carried out by larger water agencies in the state. As your draft points out in Section 9.2.4, the building codes were revised in 2014, so all newer homes will use less water than older ones. In addition, demand generally rebounds slowly after drought, since people have adopted new habits and in some cases, changed to more water-efficient landscaping, fixtures and appliances. We suggest you look more at the demand projection methodologies used by larger, urban water agencies that take these two considerations into account and apply the most appropriate methodology here. Again, a future range of demand rather than one set of demand figures would be more useful to you in water planning as well as more likely to be accurate over time. One way to develop the range might be to use the MokeWISE GPCD numbers and DOF population projections as the low end and your current figures as the high end.	6/2/2016	Recent (2008-2012) per-connection use is assumed to remain constant to be conservative. While some water suppliers may speculate when and how new building ordinances and drought behaviors may affect future water use efficiency, many (such as EBMUD) use past per-connection use to conservatively project demand based on known data. Additionally, DWR requires that one demand projection be used in the UWMP, although a range of demands may be further developed in future AWA reports such as the Long Term Needs Study.	No
11	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	On page 4-4 , the text needs to be revised since the lone backwash project is complete.	6/2/2016	The lone backwash project was not complete as of 2015, when the data was collected regarding water loss. Thus it is combined with the other backwash projects completed or to be completed in the 2016-2020 range.	No
12	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Section 4.3 states that passive savings from changes in building codes are incorporated into demand projections (this is also stated in Section 9.2.4). Please include this information within your final demand tables.	6/2/2016	The demand projections automatically incorporate savings from changes in building codes that occurred in the 2008 to 2012 time period, but does not incorporate speculated future changes.	No

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13	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Page 4-7, last sentence: This is an incomplete and speculative statement, especially as it relates to AWA operations. If more water is needed in the Mokelumne for environmental purposes, it would likely come from a larger water rights holder, not AWA, which holds comparatively small rights relative to total basin runoff.	6/2/2016	Comment noted	No
14	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Table 5.1: Does the 2008 water delivery figure include system losses?	5/31/2016	No.	No
15	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Section 6.3. Please add El Dorado County to Mokelumne headwaters counties. Tributaries to the Bear River originate in that county. Pardee Reservoir is operated in conjunction with Camanche for environmental purposes (cold water pool) as well as for water supply.	6/2/2016	See edits to text: El Dorado county added to headwater list and in stream requirements added to Pardee operation list.	Yes
16	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Section 6.5.4 and other sections on recycled water seem to bear little relationship to what is actually being done or planned in the ARSA and Jackson WW systems. The text should be updated to take that into account.	6/2/2016	The recycled water sections in the UWMP are based on the 2013 Regional Approach to Reuse Study, the most up to date regional recycled water plan. It also includes other known projects occurring in Amador County. ARSA and the City of Jackson participated and/or were invited to participate in the study, but they are not bound to follow the study.	No
17	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Section 6.8, Future water projects , is organized in a way that could mislead readers and reviewers. The MokeWISE program collaboratively agreed to certain projects <i>only as studies</i> . Those should be separated out, and the language in the last sentence of the first paragraph in the section revised to accurately represent the zone of agreement in MokeWISE.	6/2/2016	See edits to text: Removed the Lower Bear Reservoir Feasibility Update and Preliminary Engineering study from the table of future supply projects and added it to the list of studies without planned implementation. The UWMP includes DWR standardized tables and the Agency is required to report information to DWR in this format. The Future Water Supply Projects table is a standardized table and thus, summarizes potential future projects the Agency may further explore in the planning horizon from its various planning efforts, including the MokeWISE study.	Yes
18	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	On page 6-16 , the demand study is again described as an analysis of Wild and Scenic designation on future water supply. See earlier notes. Also, why is the Sutter Creek project included when it was explicitly dropped from MokeWISE because of stakeholder objections? The language on the conjunctive use project should also be clarified to properly characterize the nature of the agreement on that project in MokeWISE.	6/2/2016	See Response #1 regarding the Long Term Needs Study. The list and discussion of future projects is intended to encompass all potential future projects that would affect AWA's supply, not exclusively projects that are included in MokeWISE. Thus, the Sutter Creek Dam and Reservoir study was included in the UWMP because it is included in the 2015 MAC IRWMP Project List. See edits to text: The reference to conjunctive use has been clarified as a study rather than a project.	Yes
19	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Section 6.10.1, Climate Change , should use central Sierra snowpack projections, not projections for the range as a whole. We suggest you look at the modeling EBMUD has done for the watershed and used in its draft UWMP rather than rely on broadly speculative analysis that may have little relevance to the watershed. The "Butt" fire references in this section should be "Butte Fire."	5/31/2016	See edits to text: Changed "Butt" to "Butte". Snowpack projections are based off of most recent and specific information available from DWR. The analysis in the UWMP is consistent with EBMUD's UWMP and Climate Change Monitoring and Response Plan.	Yes
20	5/11/2016	Cecily Smith, Foothill Conservancy	UWMP Public Draft	Section 8.6 references "purchases of more-expensive supplies." Purchases from whom, when AWA has the senior water rights? Has the agency ever done this?	6/2/2016	See edits to text: removed reference to "purchases of more-expensive supplies".	Yes