



## Community and Economic Development

Norman L. Allinder, AICP  
Director

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March 9, 2015

Pam Creedon  
Executive Director  
CVRWQCB  
11020 Sun Center Drive #200  
Rancho Cordova CA 95670

Regarding: Root Creek Water District, Riverstone  
Wastewater Treatment Facility Waste Discharge  
Requirements

Dear Ms. Creedon:

I am the Planning Director of Madera County. I understand the Board will be considering the Waste Discharge Permit for Root Creek Water District Waste Water Treatment Plant that will serve the Riverstone Project. Prior to submission of this application to the RWQCB, representatives of Root Creek met with my office to go over the proposed interim and long term treatment and discharge plans. My staff reviewed the proposal and found it consistent with the EIR, the WSA and the Infrastructure Master Plan for Riverstone. My staff reviewed all the proposed modifications that are before you and determined that there are no new significant impacts.

In particular, the Hydrology section of the Gateway Village project Environmental Impact Report (now Riverstone) found that the project as proposed had a flexible, reliable and more than sufficient water supply plan that would provide, on average, a minimum of 3400 Acre feet per year of measureable beneficial groundwater recharge. The water purveyor, Root Creek Water District, has perfected contractual rights to obtain, and the rights to deliver the water, together with infrastructure including the 48 inch main pipeline and surface water delivery system RCWD completed in 2014. That is more than sufficient to supply the 3400 Acre feet per year from a mix of sources that will vary each year with hydrology. The EIR indicates that amount is significantly more than the amount needed to offset any impact that Riverstone will have on groundwater hydrology or water supply. Therefore, no additional mitigation needed to be imposed by the County.

Riverstone and RCWD are required to follow the plan that they presented to the County and that the County approved. The terms of that approved plan are described in the EIR as Mitigation for Impact 4.8.4, the potential water supply impact of the project. The EIR found that the mitigation offered by the applicant was sufficient without the County adding mitigation.

The County's position is that the water supply and recharge measures proposed by Gateway Village, studied in the Gateway EIR and adopted by the County are fully enforceable and the County will require the project to provide the specified recharge amount irrespective of the allocation of supply between the various water sources that RCWD has available. Therefore, the minor changes that RCWD has agreed upon with the RWQCB staff will not impair the County's ability to require Riverstone, and its water purveyor, RCWD to provide the approved amount of average annual beneficial recharge.

Please feel free to contact me if I can provide further clarification.

Sincerely,

Norman L. Allinder  
Director