
Via E-mail (qyaley@co.tuolumne.ca.us)
Tuolumne County Board of Supervisors
c/o Quincy Yaley, Community Development
Department Director
2 South Green Street
Sonora, California 95370

RE: Additional Information on Appeal, Highway 120 Lodging Hospitality Project

Dear Honorable Supervisors:

The Groveland Community Services District (District or GCSGD) provides water, sewer, fire and park services to the proposed Highway 120 Lodging Hospitality Project site. We have reviewed the appeal filed regarding the Planning Commission's approval of the site development permit for the above mentioned project, and provide the following comments as clarification of service concerns raised therein. We have addressed our comments using the topic headings in the order they are contained in the appeal.

Emergency Services.

- The Groveland Community Services District has adopted fire and park Development Impact Fees and a policy requiring the implementation of a service financing mechanism, such as a Community Facilities District (CFD) to fund future expansion of its existing Station 78 in downtown Groveland, located two miles from the project site. The Development Impact Fees and CFD are also intended to fund the cost of expansion of the fire engine fleet by one, and three firefighters to staff that new engine in the future when increases in call volume warrant such expansion. The implementation of the Development Impact Fees and CFD (or other annual funding) are a GCSGD requirement for the project receiving services; and thereby mitigating impacts on fire and park services. The County of Tuolumne is the entity to adopt, collect and remit to GCSGD the Development Impact Fees adopted by the District. An agreement with GCSGD for collection of the impact fees and adoption/implementation of the fees by the county is pending the approval of your Board.

Cumulative Impacts.

- The District has considered the cumulative impacts of current population and future development on its water, sewer, fire and park services; and develops master plans and financial plans to identify the necessary capital projects, purchases, staffing and funding needed to accommodate the planned growth without impacts to current service levels. The DIF and CFD, water and sewer connection and capacity fees are intended to offset cumulative impacts on services.

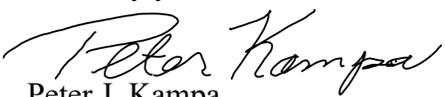
Water.

- During recent extended drought conditions from 2014-2016, the State required all public water providers to reduce water consumption by up to 20%, and GCSD complied by asking its customers to reduce water consumption by up to 20%. GCSD issued the water conservation restrictions during that time because of the state requirements, and not because of an actual shortage of water supply from the Hetch Hetchy Water System. The District has also developed an alternative water supply and water treatment system to provide water supply redundancy in the event of loss of the Hetch Hetchy supply.
- California is in the midst of a multi-year drought, however the source of GCSD's water, the Hetch Hetchy Reservoir is expected to fill to capacity following the 2022 spring runoff, which is the case in almost every water year. GCSD has adequate source water supply to serve the project demand, even in drought conditions. The GCSD District Engineer has evaluated the average daily and peak project water demands and has determined that the system can deliver the water demand of the project without impact to services to other customers. Further, the project applicant is required to enter into a Development Agreement with GCSD that establishes the terms and conditions for the project receiving services, and which contains all fees, charges, deposits, construction and dedication responsibilities, mitigation and other GCSD requirements of the project. GCSD charges water capacity and connection fees to offset the impact of project demand by increasing system capacities in the future. Again, the current system has the capacity to serve the project demand, including the demand of offsite employee housing should it be connected to the GCSD system. As a condition of receiving service from GCSD, the applicant will be required to enter into a Development Agreement, pay applicable fire and park service development impact fees, water and sewer connection/capacity fees.

Sewer.

- The GCSD wastewater collection system and wastewater treatment plant has the existing capacity available to serve the project as detailed in the wastewater demand calculations; as verified by the GCSD District Engineer. The wastewater treatment plant is over 50 years old and the District is planning an upgrade; however the proportional cost of the treatment plant's upgrade will be included in the sewer connection and capacity fees charged to the project on connection to the system. The wastewater plant upgrades could not have been analyzed or mitigated in the MND since the upgrade project timing, location, scope, capacities and other design components have not yet been analyzed or determined. The treatment plant upgrade is not needed solely as a result of this project. The payment of connection and capacity fees is required by District ordinances, as a condition of providing services to the project.

Sincerely yours,



Peter J. Kampa

Cc: GCSD Board of Directors
Jaren Nuzman, TK Consulting