

From: Loren Amelang
To: California Water Commission
Subject: Public Comment for 16 Jan Meeting (Re-sent as requested)
Date: Monday, January 07, 2019 1:07:27 PM
Attachments: Dams 2018 Chart.pdf

Brianna,

I'm a member of the Walker Lake Association, which owns Ridgewood Dam and CA's smaller Walker Lake (west of the 101 between Ukiah and Willits). The one built in 1929 by the owner of Seabiscuit. We could barely pay the DSOD fees in the past, and the new fees and requirements resulting from the Oroville scare are far beyond our means. We're hoping to get reclassified as "low hazard" but if that fails, nobody knows what will happen.

One of my efforts has been to evaluate the proposed fee structure. To illustrate the unfairness, I scraped the DSOD 2018 list of CA dams into Excel, and calculated the proposed fee per acre-foot of capacity. The resulting chart disagrees with the DSOD assertion in their Initial-Statement-of-Reasons:

<https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwater.ca.gov%2F-%2Fmedia%2FDWR-Website%2FWeb-Pages%2FPrograms%2FAll-Programs%2FDivision-of-safety-of-dams%2Ffiles%2FStatutes-and-Regs-docs%2FInitial-Statement-of-Reasons-for-Annual-Fees.pdf&data=02%7C01%7C%7Ca70cea7962d84428967908d674e40489%7Cb71d56524b834257afd7d177884564%7C0%7C1%7C636824920449707916&data=9X7itaKpUkR3nvKCxfE44BUgZlvRHATzVMJXrX62oE%3D&reserved=0>

After careful consideration this alternative was not selected since dam height generally serves as a proxy to reservoir storage.

My chart shows that for at least a third of all jurisdictional dams, height is _inversely_ related to capacity. If you believe, as we do, that water storage capacity is the primary threat from a dam, basing 95% of DSOD fees on height is unfair to these small, rural dams.

So:

I would like to submit the following statement (or this entire letter) along with the attached chart as a public comment for consideration at the January 16 meeting of the California Water Commission. Hopefully the chart could be printed and distributed in color, as that makes it much more understandable.

California Division of Safety of Dams has proposed a new fee structure that is unfair to small but high rural dams. Owners of historical treasures invaluable to wildlife and firefighting may be forced to abandon them if they can't get relief from 10X to 30X increases. Yes, DSOD must respond to Oroville. But billing 95% of their expanded budget by the height of each dam ignores two important factors:

1. Height of a dam is not the threat, volume of potential flood water is the threat.
2. Small dams in upland canyons are high, but narrow, containing little water, while the same height in a broad valley can contain 100,000 times as much.

The largest one-fourth of CA dams includes politically powerful entities paying as little as \$0.03 per acre-foot instead of up to \$3000.00 per acre-foot. I've illustrated this in a chart which highlights the contrast. Law requires fees based "in part" on height, but DSOD decides what part... Please join in requesting fees for capacity - the real threat to public safety.

Can you just make that happen with the information I've sent, or is there a more formal procedure?

Thank You,

Loren

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CA Dams L->R by Capacity, with Height (black), Crest Length (green), and proposed \$ per acre-ft (red)

