APPENDIX B:
COMMENT LETTERS REGARDING PROPOSED MUN DE-DESIGNATION

RICHARD VALLE
CORCORAN-AVENAL, DIST. II

TONY BARBA
HANFORD-ARMONA, DIST.IV

RICHARD FAGUNDES
HANFORD, DIST.V

COUNTY OF KINGS
BOARD OF SUPERVISORS

MAILING ADDRESS: KINGS COUNTY GOVERNMENT CENTER, HANFORD, CA 93230
OFFICES AT: 1400 W. LACEY BLVD., ADMINISTRATION BUILDING # 1, HANFORD
(559) 852-2362, FAX: (559) 585-8047
Web Site: http://www.countyofkings.com

CHAIRMAN 2013
DOUG VERBOON
NORTH HANFORD
NORTH LEMOORE, DIST. III

VICE-CHAIRPERSON 2013
JOE NEVES
STRATFORD-LEMOORE, DIST. I

CATHERINE
VENTURELLA
CLERK OF THE BOARD

RECEIVED
SEP 13 2013
T.L.B.W.S.D.

September 10, 2013

Mr. Clay Rodgers
Assistant Executive Officer
Central Valley Regional Water Quality Control Board
1685 E Street
Fresno CA, 93706

RE: Letter of Support for the Proposed Municipal Delisting of the Tulare Lake Bed.

Dear Mr. Rodgers,

Based upon the recommendation from the Kings County Water Commission the Kings County Board of Supervisors supports removing the groundwater MUN designation within the Tulare Lake Bed area. The County is well aware that groundwater within the Tulare Lakebed has historically and is currently unsuitable for Municipal use. The shallow groundwater contains very high levels of salt. Furthermore this area is prone to flooding.

It is the County's understanding that all of the public supply wells are located outside of the area that has been proposed for MUN delisting and that the future use of the shallow groundwater is impracticable for municipal use. Any potential new public supply wells would be located up gradient and further away from the Recommended Delisting area; which is consistent with past trends. We do not believe the MUN delisting would cause any risk to any nearby public supply wells and no shallow wells are anticipated in the future.

As stated in this letter, the County is supportive of the MUN delisting for the Tulare Lake Bed area. Our county relies heavily on the viability of agriculture in the area for its future. The farmers have been very progressive in managing the salts and through these efforts have been successful in maintaining the sustainability of these lands.

Sincerely,

KINGS COUNTY BOARD OF SUPERVISORS

Doug Verboon

Doug Verboon, Chairman

CC: Tulare Lake Basin Water Storage District

ALPAUGH COMMUNITY SERVICES DISTRICT
5446 Tule Road.
P.O. Box 262
Alpaugh, Ca 93201-0262
Phone (559) 949-8199
acsd@hughes.net

January 22, 2014

Mr. Clay Rodgers
Assistant Executive Officer
Central Valley Regional Water Quality Control Board
1685 E. Street
Fresno, CA 93706

RE: Letter of Support for the Proposed Municipal Delisting of the Tulare Lake Bed.

Dear Mr. Rodgers,

The Alpaugh Community Services District (ACSD) has met with representatives from the Tulare Lake Basin Water Storage District to discuss the proposed groundwater Municipal (MUN) delisting and is supportive of removing the groundwater MUN designation within the Tulare Lake Bed area. The ACSD views the recommended delisting area as a nonviable water supply source for municipal water supply wells now and in the future. All of the ACSD's municipal water supply wells are located outside of this area to the East.

Furthermore, the ACSD does not intend on installing new wells within the Recommended Delisting Boundary. Any potential new wells would be located up gradient and further away from the Recommended Delisting area; which is consistent with past trends. We do not believe the MUN delisting would cause any risk to our wells.

As stated in this letter, the ACSD is supportive of the MUN delisting for the Tulare Lake Bed area. Our community relies on the viability of agriculture in the area. If you have any questions please feel free to contact me.

Sincerely,

John E. Burchard
General Manager
CC: Tulare Lake Basin Water Storage District

City of
CORCORAN
PUBLIC WORKS DEPARTMENT FOUNDED 1914

September 3, 2013

Central Valley Regional Water Quality Control Board
1685 E Street
Fresno CA, 93706

RE: Letter of Support for the Proposed Municipal Delisting of the Tulare Lake Bed.

Dear Mr. Rodgers,

The City of Corcoran (City) has met with representatives from the Tulare Lake Basin Water Storage District to discuss the proposed groundwater Municipal (MUN) delisting and is supportive of removing the groundwater MUN designation within the Tulare Lake Bed area. The City views the recommended delisting area as a nonviable water supply source for municipal water supply wells now and in the future. All of the City's municipal water supply wells are located outside of this area to the east of Highway 43.

Furthermore, the City does not intend on installing new wells within the Recommended Delisting Boundary. Any potential new wells would be located up gradient and further away from the Recommended Delisting area; which is consistent with past trends. We do not believe the MUN delisting would cause any risk to our wells.

As stated in this letter, the City is supportive of the MUN delisting for the Tulare Lake Bed area. Our city relies on the viability of agriculture in the area. If you have any questions please feel free to contact me.

Sincerely,

Steve Kroeker, City of Corcoran Public Works Director

CC: Tulare Lake Basin Water Storage District

Steve Kroeker, Public Works Director
832 Whitley Avenue ' Corcoran, CA 93212 ' Phone 559.992.2151 ext. 264 ' Fax 559.992.1408
www.cityofcorcoran.com

Office Hours
8 am to 12 noon
Monday thru Friday

Stratford Public Utility District

Phone (559) 947-3037
Fax (559) 947-9312
"This institution is an equal opportunity provider, and employer."

MG MW JW JC
Copy to:
Route to:
File#
Note

December 11, 2013

RECEIVED
DEC 16 2013
T.L.B.W.S.D.

Mr. Clay Rodgers, Assistant Executive Officer
Central Valley Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

RE: LETTER OF SUPPORT FOR THE PROPOSED MUNICIPAL DELISTING OF THE TULARE LAKE BED

Dear Mr. Rodgers:

The Stratford Public Utility District (District) has spoken with representatives from the Tulare Lake Basin Water Storage District to discuss the proposed groundwater Municipal (MUN) delisting and is supportive of removing the groundwater MUN designation for the first encountered perched water in certain portions of the Tulare Lake Bed. The District views the recommended delisting area and the first encountered perched water (i.e., above 50 feet to the A-clay) as a nonviable water supply source for municipal and domestic water supply wells now and in the future.

The basis for our recommendation is the "Hydrogeologic Evaluation of Delisting Part of the Tulare Lakebed Area – Draft Report", dated April, 2013, by Kenneth D. Schmidt & Associates and Groundwater Quality Consultants, which states on page 45, "The most important conclusion from the water-level data for the shallow groundwater is that the significant vertical water-level differences in the absence of pumping are an indication of the extremely low hydraulic conductivities of clay layers, in particular the A and B-clays. Considering the low vertical conductivities of the clay layers, this means that there is very little if any downward flow of groundwater."

Although the District's Wastewater Facility is not located in the "Draft Recommended MUN Delisting" boundary as shown on Figure 30 in the above-referenced draft report, the District requests that the Regional Water Quality Control Board concur that the first encountered groundwater under the District's Wastewater Facility is not useable for municipal and domestic water supply and the groundwater that is below the A

and B clay layers is not impacted by the water quality of the first perched groundwater as discussed in the above-referenced draft report.

If you have any questions, please contact me or our Engineer, James Wegley.

Very truly yours,

Jeff Gonzalez, President

JG:je

cc: Mr. Jacob Westra, Tulare Lake Basin Water Storage District
Mr. Jim Wegley, Keller/Wegley Engineering

KETTLEMAN CITY
COMMUNITY SERVICES
DISTRICT

P.O. BOX 179 • KETTLEMAN CITY, CA 93239
(559) 386-5866 • FAX (559) 386-9202

September 17, 2013

Mr. Clay Rodgers
Central Valley Regional Water Quality Control Board
1685 E Street
Fresno CA, 93706

RE: Letter of Support for the Proposed Municipal Delisting of the Tulare Lake Bed

Dear Mr. Rodgers,

Kettleman City Community Services District (District) has reviewed the Tulare Lake Basin Water Storage District efforts for the proposed groundwater Municipal (MUN) delisting and is supportive of removing the groundwater MUN designation within the Tulare Lake Bed proposed delisting area. The District views the recommended delisting area as a nonviable water supply source for municipal water supply wells now and in the future. All of the District's municipal water supply wells are located outside of this area to the West.

Furthermore, due to water quality concerns, the District is moving forward with plans to construct a surface water treatment plant using water supplies from the California Aqueduct and does not intend to install new wells within the Recommended Delisting Boundary. Any potential new wells would be located up gradient and further away from the Recommended Delisting area which is consistent with past trends. We do not believe the MUN delisting would cause any risk to our wells.

As stated in this letter, the District is supportive of the MUN delisting for the Tulare Lake Bed area. The District relies on the viability of agriculture in the area. If you have any questions please feel free to contact me.

Sincerely,

Aletha Ware

Aletha Ware, Chairperson

J. G. BOSWELL COMPANY
CALIFORNIA OPERATIONS

January 23, 2014

Mr. Mark Gilkey
Tulare Lake Basin Water Storage District
1001 Chase Ave
Corcoran, CA 93212

RE: Letter of Support for the Proposed Tulare Lake Bed Groundwater Municipal Delisting

Dear Mr. Gilkey,

The J. G. Boswell Co. is aware and has been involved in discussions with representatives of the Tulare Lake Basin Water Storage District regarding the proposed delisting of the Tulare Lake Bed groundwater Municipal (MUN) Beneficial Use designation. Boswell is supportive of removing the MUN designation that currently applies to the shallow groundwater in the Tulare Lake Bed area.

Boswell has farmed in the Lake Bed for decades and we know that the shallow groundwater is not potable and therefore is unsuitable for municipal/domestic use. As such, Boswell currently do not use shallow groundwater water for municipal/domestic purposes and we do not intend to use do so in the future. To the extent we extract groundwater in the Lake Bed, it is pumped from deep formations below the Corcoran Clay and used for agricultural purposes.

Sincerely,
J. G. Boswell Co.

George Wurzel
Vice-President

Post Office Box 877 • Corcoran, California 93212-0877 • (559) 992-5011 • FAX: (559) 992-3884

GILKEY FIVE
DIVERSIFIED FARMING

October 7, 2013

Mark Gilkey
Tulare Lake Water Storage District
1001 Chase Ave.
Corcoran, CA 93212

RE: Support for MUN Delisting of TLB

Dear Mark,

Gilkey Five is in full support of TLBWSD and TLDD's effort to remove the MUN designation from the shallow groundwater of the Tulare Lake Basin. We are totally aware of and have been involved in discussions regarding this matter.

Our family has farmed within the Tulare Lake Basin since the 1920's and know from trial and error that the waters within the area, above the Corcoran Clay, are unsuitable for Municipal use. We will make no attempt to use said waters for municipal purpose. Any use of groundwater, drawn from below the Corcoran Clay, is strictly intended for agricultural purposes.

Sincerely,

Ralph Gilkey/Partner
Gilkey Five

POST OFFICE BOX 426 • 2411 WHITLEY AVENUE • CORCORAN, CALIFORNIA 93212 • (559) 992-2136

Hansen Equipment
Double J Farms
MH Farms
Philco Farms
Big Bolls Farms
Tulare Lake Farming Co.

HANSEN RANCHES

James B. Hansen
Jess V. Hansen
Phillip W. Hansen
Mark V. Hansen
Erik J. Hansen
Nis P. Hansen

January 21, 2014

Mr. Mark Gilkey
Tulare Lake Basin Water Storage District
1001 Chase Ave.
Corcoran, CA 93212

RE: Letter of Support for the Proposed Groundwater Municipal Delisting of the Tulare Lake Bed

Dear Mr. Gilkey,

I am aware and have been involved in discussions with representatives from the Tulare Lake Basin Water Storage District regarding the proposed groundwater Municipal (MUN) delisting. I am supportive of removing the Municipal (MUN) designation in the shallow groundwater in the Tulare Lake Bed area.

As you know, our family has farmed within this area for generations and we know that waters within the area are unsuitable for Municipal use. We do not intend to attempt to make any municipal use of the water to be delisted. Our use of groundwater is for agricultural purposes and is from deep waters below the Corcoran Clay.

Sincerely,

James Hansen

James Hansen
JH/tlc

Post Office Box 398 - Corcoran, California 93212 - Ph. (559) 992-3111 - FAX (559) 992-2107
Location: Corcoran Airport - 7124 W. Whitley Avenue

PATRICK W. NEWTON
DANNY NEWTON

RANCH PHONE (559) 947-3358
FAX (559) 947-3300

NEWTON BROS.

PO BOX 117 • STRATFORD • KINGS COUNTY • CALIFORNIA 93266

January 25, 2014

Mr. Mark Gilkey
Tulare Lake Basin Water Storage District
1001 Chase Ave
Corcoran, CA 93212

RE: Letter of Support for the Proposed Groundwater Municipal Delisting of the Tulare Lake Bed.

Dear Mr. Gilkey,

Newton Bros is aware and has been involved in discussions with representatives from the Tulare Lake Basin Water Storage District regarding the proposed groundwater Municipal (MUN) delisting. Newton Bros is supportive of removing the Municipal (MUN) designation in the shallow groundwater in the Tulare Lake Bed area.

As you know, the Newton family has farmed within this area since 1911 and we know that waters within the area are unsuitable for Municipal use. We do not intend to attempt to make any municipal use of the water to be delisted. Our use of groundwater is for agricultural purposes and is from deep waters below the Corcoran Clay.

Sincerely,

Danny Newton, Patrick Newton, Paul Newton & John Newton

Danny Newton
Patrick
Paul Newton
John Newton

Sandridge Partners

960 North San Antonio Road – Ste. 114
Los Altos, CA 94022

Phone (650) 209-3232
Fax (650) 209-3244

January 31, 2014

Mr. Mark Gilkey
Tulare Lake Basin Water Storage District
1001 Chase Avenue
Corcoran, CA 93212

Re: Letter of Support for the Proposed Groundwater Municipal Delisting of the Tulare Lake Bed

Dear Mr. Gilkey:

Sandridge Partners is aware and has been involved in discussions with representatives from the Tulare Lake Basin Water Storage District regarding the proposed groundwater Municipal (MUM) delisting. Sandridge Partners is supportive of removing the Municipal (MUM) designation in the shallow groundwater in the Tulare Lake Bed area.

As you know, Sandridge Partners has farmed within this area for many years and we know that waters within the area are unsuitable for Municipal use. We do not intend to attempt to make any municipal use of the water to be delisted. Our use of groundwater is for agricultural purposes and is from deep waters below the Corcoran Clay.

Sincerely,

Ted R. Page
Agent for John T. Vidovich, General Partner, Sandridge Partners

MG MJ JW JC
Copy to:
Route to:
File#
Note

October 7, 2013

Mr Mark Gilkey
Tulare Lake Basin Water Storage Dist.
1001 Chace Ave
Corcoran, Ca. 93212

RE: Letter of Support of Proposed Groundwater Municipal Delisting of Tulare Lake Bed.

Dear Mr Gilkey,

I am aware of proposed groundwater Municipal (MUN) delisting and have discussed it with representative of Tulare Lake Basin Water Storage District. I am supportive of removing the Municipal (MUN) designation in the shallow groundwater in the Tulare Lake Bed area.

My family has farmed within this area for generations, having purchased this property in 1887, and we know that waters within the area are unsuitable for Municipal use. We do not intend to attempt to make any municipal use of the water to be delisted. Any use of groundwater would be for agricultural purposes and would be from deep waters below the Corcoran Clay.

Sincerely,
William Seyton
Section 3, Township 23 South, Range 22 East, County of Kings

Carlo J. Wilcox

January 22, 2014

Mr. Mark Gilkey, General Manager
Tulare Lake Basin Water Storage District
1001 Chase Avenue
Corcoran, CA 93212

RE: Letter of Support for the Proposed Groundwater Municipal Delisting of the Tulare Lake Bed.

Dear Mr. Gilkey,

I am aware of and have been involved in discussions with representatives from the Tulare Lake Basin Water Storage District with respect to the proposed groundwater Municipal (MUN) delisting of land in the Tulare Lake area. I support removing the Municipal (MUN) designation with respect to shallow groundwater in the Tulare Lake Bed area.

I have owned property in the Tulare Lake area for the past six years and have worked in the area for the past 40 years. The first encountered (shallow) groundwater in the area is extremely poor quality and is unsuitable for either municipal or agricultural use. My property overlies no usable groundwater, neither shallow nor deeper. In fact the property was tile drained until the disposal site, an evaporation pond, was shut down by State regulatory agencies. Because of the quality of the shallow groundwater, I have no intentions to attempt to make any use, either agricultural or municipal, of the water being considered to be delisted. Further, as mentioned above, there is no usable groundwater underlying the property at any depth; and as such, no uses of groundwater for any purposes are contemplated.

Please contact me if you need any additional information.

Sincerely,

Carlo J. Wilcox

731 Estes Avenue, Corcoran, CA 93212 Home 559-992-4206 Office 559-992-5165

April 30, 2015

Pam Buford
California Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706

Re: Notice of Public Workshop and CEQA Public Scoping Meeting for the Evaluation of the Municipal and Domestic Supply (MUN) and Agricultural Supply (AGR) Beneficial Uses in a Portion of the Historical Tulare Lakebed

Dear Ms. Buford,

We submit these comments in response to the "Notice of Public Workshop and California Environmental Quality Act Public Scoping Meeting" for the "Evaluation of the Municipal and Domestic Supply (MUN) and Agricultural Supply (AGR) Beneficial Uses in a Portion of the Historical Tulare Lakebed". The Public Notice states that the Scoping Meetings will include discussions of potential amendments to the Tulare Lake Basin Plan to incorporate a framework for evaluating the applicability of the MUN and AGR beneficial uses and associated water quality objectives throughout the Tulare Lake Basin. Accordingly, these comments address those potential amendments as well.

Basin Planning is a "certified regulatory program," and therefore requires development of a Substitute Environmental Document (SED) pursuant to the California Environmental Quality Act (CEQA). Through said document the Central Valley Regional Quality Control Board (CVWQCB or Board) must comply with CEQA's mandate to disclose the environmental effects of a proposed change to a basin plan and must "identify the environmental effects of projects, and then to mitigate those adverse effects through the imposition of feasible mitigation measures and / or through the selection of feasible alternatives." Public Resources Code § 21159, *et seq.; see also, Sierra Club v. State Bd. of Forestry*, 7 Cal. 4th 1215, 1233 (1994).

Our comments focus on the responsibility of the Board to consider the impact of any proposed change on the quality and reliability of drinking water sources for low income communities and communities of color that rely for their drinking water supply on groundwater that is currently or may in the future become contaminated (vulnerable communities). The Board must consider, as part of this analysis, the impact that any proposed change will have for communities reliant for MUN uses on both public water systems and state small systems, as well as for individuals relying on private wells. The Board must consider the impact on both current and future MUN beneficial uses.

Under California law, "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. Gov. Code, § 65040.12, subd. (e). Fairness in this context means that the *benefits* of a healthy environment should be available to everyone, and the *burdens* of pollution or inequitable investments should not be focused on sensitive populations or on communities that already are experiencing its adverse effects. Agencies subject to CEQA, including state and regional water boards, must promote these principles. Pub. Res. § 71110, *et. seq.* Accordingly, the CVWQCB must analyze and address the *distribution* of environmental impacts and any disparities affecting low-income people and people of color, to ensure that the benefits and burdens of the any de-designation or Basin Plan Amendment are fairly distributed.

CEQA requires consideration of "economic, environmental, and social factors," particularly, "the goal of providing a decent home and satisfying living environment for every Californian." CEQA Guidelines, §15021. CEQA Guidelines, and the guidelines governing water boards, specifically require responsible agencies to determine if a proposed project will expose "sensitive receptors" to pollution. *See e.g.*, 14 C.C.R., Appendix G; 23 C.C.R., Appendix A. Moreover, "CEQA requires a lead agency to consider whether a project's effects, while they might appear limited on their own, are 'cumulatively considerable' and therefore significant." Pub. Res. Code, § 21083, subd. (b)(3). Consideration of cumulative effects is especially crucial for vulnerable communities, who may already be burdened by pollution from existing sources. *Kings County Farm Bureau v. City of Hanford*, 221 Cal. App. 3d 692, 723-24 (Cal. Ct. App. 1990) (EIR inadequate since it failed to study effects of all proposed power projects in San Joaquin Air basin); *Los Angeles Unified School District v. Los Angeles*, 58 Cal. App. 4th 1019, 1025-26 (Cal. Ct. App. 1997) (EIR inadequate since it failed to study increased noise pollution in relation to existing levels of noise pollution). Under CEQA, an agency is required to find that a "project may have a 'significant effect on the environment'" if, among other things, "[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly[.]" Pub. Res. Code, § 21083, subd. (b)(3); *see also*, CEQA Guidelines, § 15126.2.

The SED must explicitly and robustly identify <u>and assess</u> mitigations for impacts that potentially impact vulnerable communities. This includes the impacts, disaggregated by race and income, related to: access to water that meets water quality objectives in the short and long term, costs

related to accessing potable water, and other public health factors (including those related to chronic diseases).

The Board must assess each proposed change and each alternative as a whole and its constituent parts for its impact on vulnerable communities. The SED must assess each proposed change and each alternative's impact on vulnerable and environmental justice communities in the short and long term, on current drinking water sources and on potential drinking water sources, on vulnerable communities in the aggregate, vulnerable communities in identifiable hydrologically relevant regions, and in each potentially impacted community. In each analysis, the SED must assess the maximum impact that each alternative may have on communities and individuals that will potentially be impacted by de-designation, by the proposed basin plan amendments, and programs and policies that derive their authority from the modified basin plan, including programs and policies developed in basins beyond the Tulare Lake Basin.

Not only must each proposed change and each alternative be assessed holistically for its impact on vulnerable communities but each critical component and each mitigation measure, as discussed below, must be assessed for such impact. The assessment should evaluate the impact on vulnerable communities as a whole and include specific information with respect to numbers of communities and residents impacted by each alternative and the impact of each alternative on specific geographies, communities and individuals as discussed above. Specifically,

- The SED must assess each proposed change to the Beneficial Use Classification system, including but not limited to the creation of new beneficial uses, the creation of beneficial use subcategories such as "limited" or "restricted" MUN beneficial uses, the use of interim designations in water bodies that are not specifically named in the Basin Plan, and de-designation of existing beneficial uses in specific water bodies or categories of water bodies.

- The SED must include an analysis of how any proposed change will impact drinking water quality for any person, including those individuals and communities relying on private wells and wells serving fewer than fifteen people. The SED must conduct this analysis over the short and long term.

- Similarly, the SED must assess the impact of each modified Water Quality Objective (WQO) for the above-mentioned modified MUN uses.

- The SED must assess the health and fiscal impacts of any proposed change to WQOs including the elimination or modification of any relevant secondary MCL.

- The analysis must include the health and fiscal impact of any proposed change on current and potential beneficial uses of the subject groundwater and the health and fiscal impact

of any proposed mitigations measures on current and potential beneficial uses of subject groundwater.

- The SED must analyze any potential modification or modifications to the basin plan for its maximum potential short and long term impact on all drinking water sources, including both current and potential drinking water sources.

- To the extent that any proposed amendment or mitigation measure relies on treatment or monetary compensation, rather than groundwater protection, the SED must assess its potential impact on groundwater quality and compliance with relevant state law, including the state's Anti-degradation policy.

- The SED must assess the maximum potential impact of the proposed de-designation of the Historical Tulare Lakebed as well as the maximum potential impact of any basin plan amendment that includes a framework for de-designating MUN uses throughout the planning area. The SED must include in its evaluation of the latter an analysis of how findings in the Tulare Lakebed de-designation study are sufficiently replicable to serve as the foundation for a basin-wide framework.

- Similarly, the SED must assess the potential use of any modified framework for evaluating de-designation or modified MUN designations beyond the Tulare Lake Basin, and the impacts thereof.

- The SED must assess any change to the manner in which WQOs are applied or assessed including any expanded discretion granted to the Board to alter compliance standards. The SED must assess both the health and economic impacts of any such change.

We welcome any questions regarding these comments and look forward to reviewing the substitute environmental documentation for the proposed changes to ensure that it effectively and fairly promotes the Board's responsibility to protect the water for all residents within its jurisdiction. Should you have any questions, please do not hesitate to contact Phoebe Seaton at pseaton@leadershipcounsel.org or by phone at 559-369-2790.

Sincerely,

Phoebe Sarah Seaton
Co-Director and Attorney
Leadership Counsel for Justice and Accountability

Jennifer Clary
Water Policy Analyst
Clean Water Action

Laurel Firestone
Co-Executive Director and Attorney at Law
Community Water Center