

2009 MAR 10 PM 3:37

July 8, 2008

BY E-MAIL

Greg Wilson, WRCE
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Petition for Temporary Transfer of River Garden Farms Co. (License 1718; Application 575)

Dear Greg:

I am forwarding Reclamation District No. 787's groundwater management plan (Plan), which was adopted by the District in 2006. You requested the Plan during our meeting on July 2, 2008 to discuss approval of the above-referenced Petition for Temporary Transfer of Water Rights. I am also forwarding the monitoring and mitigation plan River Garden Farms (RGF) submitted to the Bureau of Reclamation in connection with its groundwater-substitution transfer.

The Plan lists four management objectives, one of which is the development of the local groundwater supply. (Plan, p. 7.) "Included in this objective is the intent to participate in ground-water substitution or other similar water transfer opportunities, when possible." (*Id.*)

The Plan also contemplates using the data gathered during water transfers to help accomplish the Plan's main objective of sustainably operating within the yield of the basin. (Plan, p. 17.) In fact, the Plan points out that data gathered during RGF's 2003 water transfer "can be interpreted to indicate[] that at least 1,581 afy of ground water can be pumped. . . without short-term or long-term impacts." (*Id.*) The Plan goes on to state "[o]bservations are expected to continue during future projects that include increases in ground-water pumpage. This type of operational understanding of basin yield will be adequate to accomplish the objectives of operating within the sustainable yield of the basin and avoiding overdraft." (*Id.*)

The Plan explicitly includes groundwater-substitution transfers in two of its four objectives. Because the Plan specifically incorporates groundwater-substitution transfers, RGF's proposed transfer is consistent with the Plan.