

Karna E Harrigfeld
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July 27, 2018

VIA ELECTRONIC MAIL

State Water Resources Control Board
Attn: Ms. Jeanine Townsend
1001 I Street, 24th Floor
Sacramento, California 95814
Email: LSJR-SDComments@waterboards.ca.gov

Dear Ms. Townsend:

The Eastside Water District (EWD) is very concerned and opposes the State Water Resources Control Board (Water Board) proposed amendments to the Bay-Delta Water Quality Control Plan (Final Plan Amendments) and the Final Substitute Environment Document (Final SED). The Final Plan Amendments dedicate 40% of the unimpaired flow on the Tuolumne and Merced Rivers to the environment. Implementation of this action will take a significant amount of surface water away from water users on the Tuolumne and Merced rivers that could otherwise be used to achieve groundwater sustainability under the Sustainable Groundwater Management Act (SGMA).

EWD was formed for the sole purpose to address the overdrafted groundwater condition within its boundaries. EWD is located in Stanislaus and Merced Counties over the Turlock Groundwater Sub-Basin (Sub-Basin) of the San Joaquin Valley Groundwater Basin. Approval of the Final Plan Amendments will deprive EWD access to purchases of wet years from the Turlock and Merced Irrigation District canals lying adjacent to EWD.

The continued viability of EWD, and the agricultural lands within its boundaries, is completely tied to the opportunity to utilize surface water supplies when available. Dedication of 40% of the unimpaired flow recommended in the Final SED will significantly impact EWD's ability to obtain a sufficient quantity of surface water supply to achieve sustainability under SGMA.

EWD joins in the comments submitted by the San Joaquin Tributary Authority, and the Modesto and Turlock Irrigation Districts.

Very truly yours,



KARNA E. HARRIGFELD
Attorney-at-Law

From: Laura Cummings <LCummings@herumcrabtree.com>
Sent: Friday, July 27, 2018 11:03 AM
To: LSJR-SD-Comments@waterboards.ca.gov; WQCP1Comments
Cc: Karna Harrigfeld
Subject: Comment Letter - Revisions to Proposed Bay-Delta Plan Amendments
Attachments: EWD - Comment Letter - Revisions to Proposed Bay-Delta Plan Amendments.pdf

Importance: High

Categories: Red Category

Good morning Ms. Townsend:

Attached please find Ms. Harrigfeld's Comment Letter regarding the above-referenced matter, prepared on behalf of our client Eastside Water District.

Sincerely,

Laura Cummings

Legal Assistant to
Steven A. Herum
Jeanne M. Zolezzi
Karna E. Harrigfeld

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