

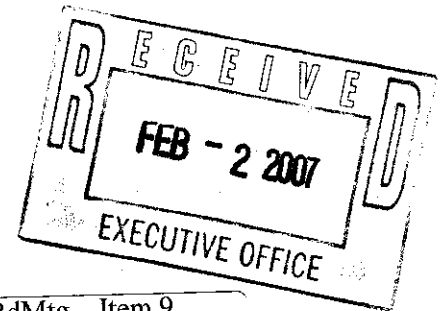
# THE CENTRAL SAN JOAQUIN WATER CONSERVATION DISTRICT

"67,000 acres of diversified family farms in San Joaquin County, California"  
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January 30, 2007



Tam M. Doduc, Chair  
State Water Resources Control Board  
1001 I Street, 14<sup>th</sup> Floor  
Sacramento, CA 95814

2/20 BdMtg Item 9  
N. San Joaquin  
Deadline: 2/8/07 12pm

Ms. Victoria Whitney, Chief  
Division of Water Rights  
State Water Resources Control Board  
1001 "I" Street, 14<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: North San Joaquin Petition for Request for Reconsideration for  
Water Right Permit #10477**

Dear Ms. Doduc:

The Board of Central San Joaquin Water Conservation District submits this letter in support of North San Joaquin Water Conservation District's petition for Request for Reconsideration. Central San Joaquin agrees with and supports the legal analysis and factual representations presented in the Request for Reconsideration and attached documents.

Central San Joaquin is a neighboring district of North San Joaquin and overlies a common ground water aquifer. The aquifer is in a state of overdraft and has been designated as a "critically overdrafted basin" by the State of California. Both Districts have been addressing the issue of overdraft for many years.

A major component of the fight to correct the overdrafted basin is the supply of surface water from areas of origin or areas immediately adjacent to the Districts. In particular, North San Joaquin has pursued the water rights described in permit number 10477. Access to this water is crucial in addressing the overdraft problems existing in North San Joaquin. Without reviewing the entire history of North San Joaquin, it is apparent that this supply from the Mokelumne River is the only existing available surface supply to correct the overdraft problem and to contain the effect of saline intrusion.

In pursuing this water right, North San Joaquin has demonstrated due diligence as required by Water Code Section 1396. To address funding needs North San Joaquin has established a ground water extraction fee to pay for the efforts of securing this supplemental supply. The fee was established several years ago after a vote of existing

land owners. Funds are used to support ongoing investigation and pilot projects to address the overdraft issue.

In particular, North San Joaquin has been active in the San Joaquin Ground Water Banking Authority, a regional effort of the Water agencies in San Joaquin County. The Ground Water Banking Authority is developing an integrated regional water management plan. This effort has been ongoing for several years. A vital component of the effort is the water right entitlements for ground water re-charge and direct use under water right permit number 10477. North San Joaquin has also been active in working with other local interests to actualize the Farmington Ground Water Recharge Program and the Cal Fed Bay Delta program.

For the above stated reasons, Central San Joaquin supports the North San Joaquin petition for Reconsideration. This is water of great importance to the Eastern San Joaquin County area because of the critically overdrafted basin and the need for supplemental surface water. North San Joaquin has actively pursued the water rights application by voting for fees to fund investigation and projects, and by participating in long standing local efforts to re-charge the overdrafted basin. For these reasons we strongly urge your reconsideration and your support of the efforts to preserve this water right.

Very Truly Yours,



Reid W. Roberts, Secretary

**CC:**

**Karna Harrigfeld**

**Kevin Kauffman**

**Mel Lytle**

**Thomas J. Shepard Sr.**