



April 2, 2015

Assemblymember Adam Gray
PO Box 942849
Sacramento, CA 94249-0021

Subject: MID and TID Support of AB 1242

Dear Assemblymember Gray:

Formed in 1887 as the first publicly-owned irrigation districts in California, MID and TID today serve water to approximately 8,800 growers who irrigate approximately 210,000 acres within MID and TID's irrigation boundary. Additionally, MID and TID provide electric service to nearly 215,000 accounts.

The conjunctive use of Tuolumne River surface water applied on farmland to recharge groundwater resources is a key water management strategy that has been employed by MID and TID for decades. Planned recharge in wet years, combined with strategic pumping in dry years, has been to the long-term benefit of our region. It is the conjunctive use practices of MID and TID that have minimized regional groundwater effects to only periods of sequential critically dry years.

In comparing Phase 1 of the State Water Resources Control Board's Bay Delta Water Quality Control Plan (Bay-Delta Plan) as well as the Sustainable Groundwater Management Act of 2014 (SGMA), it is clear that the state is on a path to conflicting policies on groundwater management that must be reconciled. AB 1242 attempts to resolve these conflicting policies.

As such, MID and TID support AB 1242. Further, we believe AB 1242 adds needed statutory clarity to the intent and spirit of Section 10720.9 of the Water Code, which states:

"10720.9. All relevant state agencies, including, but not limited to, the board, the regional water quality control boards, the department, and the Department of Fish and Wildlife, shall consider the policies of this part, and any groundwater sustainability plans adopted pursuant to this part, when revising or adopting policies, regulations, or criteria, or when issuing orders or determinations, where pertinent."

The State Water Board's preferred alternative to require 35 percent of unimpaired flows on the Stanislaus, Tuolumne and Merced rivers from February through June annually, as envisioned by Phase 1 of the Bay-Delta Plan, will have "significant and unavoidable" effects on groundwater (SWRCB, December 2012 Draft Substitute Environmental Document (SED)). These impacts would severely undermine the ability of local agencies to effectively pursue sustainable groundwater management activities and recharge programs that will be necessary for SGMA compliance.

In addition to many other negative effects of the proposed Bay-Delta Plan to the region MID and TID serve, certain hydrological realities of groundwater usage are discarded in the State Water Board's SED as collateral damage in deference to proposed environmental objectives of Phase 1. Two of these realities are: 1) when surface water is short, water users rely more on groundwater, and 2) when surface water is short, less surface water is available for groundwater recharge. Neither of these realities are duly considered by the Bay-Delta Plan.

With the reasons listed above, MID and TID support AB 1242 as currently written, and offer our assistance to you and your staff.

Sincerely,



Roger VanHoy
General Manager
Modesto Irrigation District



Casey Hashimoto, P.E.
General Manager
Turlock Irrigation District