

MEMORANDUM



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WATER RESOURCES

Date: October 15, 2021
To: Mladen Bandov, P.E.
Supervising Water Resources Engineer
From: Board of Directors
Edna Ranch East Mutual Water Company
Via: Rob Miller, PE 
Subject: Comment Regarding Draft Groundwater Sustainability Plan

Wallace Group has been retained by Edna Ranch Mutual Water Company (ERMWC) to provide input on the draft GSP. After reviewing the agenda package for the upcoming October 20th meeting, it does not appear that staff has proposed any new language or amendments to Section 9.5.2.2 as a result of the comments received from ERMWC. We request that the Committee consider the following addition at the end of Section 9.5.2.2:

Certain entities such as small community water systems may be defined as a separate category of extractors that 1) do not meet the statutory definition of de minimis user, 2) do not exceed a defined threshold on a per parcel basis, and 3) extract an insignificant volume from the basin as defined by a threshold percentage of total basin extractions. Such entities may qualify for an exclusion/exemption from pumping restrictions outlined within the 5 year management plan.

Please let me know if you have questions, and your consideration is appreciated.

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