

SCM



Water Resources ♦ Flood Control ♦ Water Rights

907-024  
1507-1-017

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1913-1985

CONSULTANTS:  
JOSEPH I. BURNS, P.E.  
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April 4, 2018

Mr. Erik Ekdahl, Deputy Director  
Division of Water Rights  
State Water Resources Control Board  
P.O. Box 2000  
Sacramento, CA 95812-2000

**Subject: Garden Highway Mutual Water Company Petition for Change Involving Water Transfer under License 2033 (Application 1699)**

Dear Mr. Ekdahl:

On behalf of Garden Highway Mutual Water Company (Company), enclosed are the following documents relative to a Petition for Change Involving Water Transfer (Petition) under Company's License 2033 (Application 1699):

1. Petition for Change Involving Water Transfers Form with Attachment (one original and one copy).
2. Environmental Information Form with Attachment (one original and one copy).
3. Check in the amount of \$3,797.00 to cover the Petition fees, which is based on a total quantity proposed to be made available for transfer, up to 6,000 acre-feet (AF).
4. Check in the amount of \$850.00 to cover the fee for the Department of Fish and Wildlife.

The Company is petitioning to temporarily add a point of diversion, point of rediversion, place of use, and purposes of use to its License 2033 in order to transfer up to a total of 6,000 AF to participating State Water Contractor (SWC) Agencies by groundwater substitution. As you are aware, time is of the essence to process this Petition for the implementation of the water transfer to the SWC Agencies; and we appreciate your attention to this Petition.

Following your review of the Petition, please call if you have any questions or require additional information.

Sincerely,  
MBK ENGINEERS

Darren B. Cordova

DC/jp

2875.18/ERIK EKDAHL GHMWC PETITION FOR 2018 TRANSFER 2018-04-04

Enclosures

cc: Jon Munger, Garden Highway MWC  
Al Montna, Garden Highway MWC  
Nicole Van Vleck, Garden Highway MWC  
Andrew Hitchings, Somach, Simmons & Dunn  
Sean Maguire, Division of Water Rights  
Anna Fock, DWR SWPAO  
Bill Brewster, DWR North Central Regional Office  
Guadalupe Rivera, Sutter County GSA (via email)  
Michelle Snapp, CVRWQCB (via certified mail)  
Lauren Dailey, Department of Fish and Wildlife (via certified mail)  
Board of Supervisors, County of Sutter (via certified mail)  
Board of Supervisors, County of Kern (via certified mail)  
Board of Supervisors, County of Kings (via certified mail)  
Board of Supervisors, County of Los Angeles (via certified mail)  
Board of Supervisors, County of Orange (via certified mail)  
Board of Supervisors, County of Riverside (via certified mail)  
Board of Supervisors, County of San Bernardino (via certified mail)  
Board of Supervisors, County of San Diego (via certified mail)  
Board of Supervisors, County of Ventura (via certified mail)

Please indicate County where your project is located here:

Sutter

MAIL FORM AND ATTACHMENTS TO:
State Water Resources Control Board
DIVISION OF WATER RIGHTS
P.O. Box 2000, Sacramento, CA 95812-2000
Tel: (916) 341-5300 Fax: (916) 341-5400
http://www.waterboards.ca.gov/waterrights

PETITION FOR CHANGE INVOLVING WATER TRANSFERS

Separate petitions are required for each water right. Mark all areas that apply to your proposed change(s). Incomplete forms may not be accepted. Location and area information must be provided on maps in accordance with established requirements. (Cal. Code Regs., tit. 23, § 715 et seq.) Provide attachments if necessary.

- Point of Diversion, Point of Rediversion, Place of Use, Purpose of Use, Temporary Urgency, Temporary Change, Long-term Transfer, Instream Flow Dedication

Application 1699 Permit 1793 License 2033 Statement

I (we) hereby petition for change(s) noted above and described as follows:

Point of Diversion or Rediversion - Provide source name and identify points using both Public Land Survey System descriptions to 1/4-1/4 level and California Coordinate System (NAD 83).

Present: See Attachment No. 1
Proposed: See Attachment No. 1

Place of Use - Identify area using Public Land Survey System descriptions to 1/4-1/4 level; for irrigation, list number of acres irrigated.

Present: See Attachment No. 1
Proposed: See Attachment No. 1

Purpose of Use

Present: Irrigation
Proposed: Irrigation, Municipal, Industrial, Domestic

Instream Flow Dedication - Provide source name and identify points using both Public Land Survey System descriptions to 1/4-1/4 level and California Coordinate System (NAD 83).

Upstream Location: Not Applicable
Downstream Location:

List the quantities dedicated to instream flow in either: cubic feet per second or gallons per day:

Table with 12 columns for months (Jan-Dec) and rows for flow quantities.

Will the dedicated flow be diverted for consumptive use at a downstream location? Yes No
If yes, provide the source name, location coordinates, and the quantities of flow that will be diverted from the stream.

Proposed New User(s)

Provide the names, addresses, and phone numbers for all proposed new user(s) of the water right.

See Attachment No. 1

RECEIVED 4/4/08 CWRS 9701 9702 \$850.00 \$3,797.00

**Amount of Water to be Transferred**

Up to 6,000 acre-feet will be transferred. If the basis of right is direct diversion, the average rate of diversion for the maximum 30-day period of use is Up to 39 cubic feet per second or million gallons per day.

**General Information** – Provide the following information, if applicable to your proposed change(s).

Have you attached an analysis which documents that the amount of water to be transferred or exchanged would have been consumptively used or stored in the absence of the proposed temporary change or long-term transfer?  Yes  No

Have you attached an analysis of any changes to streamflow, water quality, timing of diversion or use, return flows, or effects on legal users from the proposed temporary change or long-term transfer?  Yes  No

Have you attached an analysis that shows the proposed temporary change or long-term transfer will not unreasonably affect fish, wildlife, or other instream beneficial uses?  Yes  No

I (we) have access to the proposed point of diversion or control the proposed place of use by virtue of:  
 ownership  lease  verbal agreement  written agreement

If by lease or agreement, state name and address of person(s) from whom access has been obtained.

Not Applicable

Give name and address of any person(s) taking water from the stream between the present point of diversion or redirection and the proposed point of diversion or redirection, as well as any other person(s) known to you who may be affected by the proposed change.

See Attachment No. 1

**All Right Holders Must Sign Below:** I (we) declare under penalty of perjury that this involves only the amount of water which would have been consumptively used or stored in the absence of the proposed temporary change, and that the above is true and correct to the best of my (our) knowledge and belief.

Dated April 4, 2018 at Sacramento, CA

*Darren B. Cordova*  
Right Holder or Authorized Agent Signature  
*DARREN B. CORDOVA, MBK ENGINEERS ON BEHALF OF GARDON HIGHWAY MNC*

Right Holder or Authorized Agent Signature

NOTE: All petitions must be accompanied by:  
(1) the form Environmental Information for Petitions, available at: [http://www.waterboards.ca.gov/waterrights/publications\\_forms/docs/pet\\_info.pdf](http://www.waterboards.ca.gov/waterrights/publications_forms/docs/pet_info.pdf)  
(2) Division of Water Rights fee, per the Water Rights Fee Schedule, available at: [http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/fees/](http://www.waterboards.ca.gov/waterrights/water_issues/programs/fees/)  
(3) Department of Fish and Wildlife fee of \$850 (Pub. Resources Code, § 10005)

**Attachment No. 1**  
**to Petition for Change Involving Water Transfers**  
**License 2033 (Application 1699)**  
**Held by Garden Highway Mutual Water Company**

**PURPOSE OF PETITION**

The purpose of this Petition for Change Involving Water Transfers (Petition) is to: (1) add the State Water Project's (SWP) Harvey O. Banks Pumping Plant as a point of diversion, (2) add San Luis Reservoir as a point of redirection, (3) add a portion of the service area of the SWP as an additional place of use, and (4) add municipal, industrial, and domestic purposes under Garden Highway Mutual Water Company's (Company) License 2033 (Application 1699). This Petition is being filed to facilitate a temporary transfer (2018 Water Transfer) of up to 6,000 acre-feet (AF) of surface water from the Company within May through September 2018, which will be made available by groundwater substitution, prior to subtracting streamflow depletion loss, to participating State Water Contractor (SWC) Agencies in order to provide an additional water supply for irrigation, municipal, industrial, and domestic purposes. Groundwater substitution involves the use of groundwater pumped to produce crops within the Company in exchange for a like amount of surface water that will remain instream for diversion at the proposed additional point of diversion. Absent the proposed temporary transfer, the Company would divert the entire quantity of surface water proposed for transfer from the Feather River pursuant to its water right.

**POINT OF DIVERSION OR REDIVERSION**

**POINT OF DIVERSION**

***Present Point of Diversion:***

No change in the present point of diversion is proposed. The Company's authorized point of diversion under License 2033 is listed below:

<b><u>Description*</u></b>	<b><u>Located Within*</u></b>			
	<b><u>1/4, 1/4</u></b>	<b><u>Sec</u></b>	<b><u>T</u></b>	<b><u>R</u></b>
N 72° 00' E, 4,130 feet from the SW corner of Section 24, T13N, R3E	SW, SE	24	13N	3E

\* All references to Section, Township, and Range are to the MDB&M.

***Proposed Additional Point of Diversion:***

No change in the present point of diversion is proposed. The Company proposes to add the following point of diversion:

**Banks Pumping Plant via the Clifton Court Forebay**

N 2,126,440 ft., E 6,256,425 ft., California Coordinate System Zone 3, NAD 83, being within the NW ¼ of SE ¼ of Projected Section 20, T1S, R4E, MDB&M. This proposed additional point of diversion is identified on maps filed with the Division of Water Rights (Division) under Application 5630.

**POINT OF REDIVERSION**

***Proposed Additional Point of Rediversion:***

The Company proposes to add the following point of rediversion:

**San Luis Reservoir**

N 1,845,103 ft., E 6,393,569 ft., California Coordinate System Zone 3, NAD 83, being within the SW ¼ of SE ¼ of Projected Section 15, T10S, R8E, MDB&M. This proposed additional point of rediversion is identified on maps filed with the Division under Application 5630.

**PLACE OF USE**

***Present:***

The present place of use is 3,708.45 acres net within a gross area of 3,765.45 acres, as shown on a map contained in the Division's files for License 2033.

***Proposed:***

No change in the present place of use is proposed. The Company proposes to add a portion of the service area of the SWP as the proposed additional place of use in order to facilitate the temporary water transfer to the participating SWC Agencies. This portion of the service area of the SWP is shown on Map 1878 – 1, 2, 3, and 4 on file with the Division under Application 5630.

**PROPOSED NEW USERS**

The proposed new users will be water users within the following SWC Agencies listed below:

Dudley Ridge Water District  
c/o Rick Besecker  
Provost & Pritchard Engineering Group, Inc.  
286 W. Cromwell Avenue  
Fresno, CA 93711-6162

Kern County Water Agency  
Lara Kimm  
P. O. Box 58  
Bakersfield, CA 93302

Metropolitan Water District of Southern  
California  
Steve Hirsch  
1121 L. Street, Suite 900  
Sacramento, CA 95814-3974

Palmdale Water District  
Jon Pernula  
2029 East Avenue Q  
Palmdale, CA 93550

**GENERAL INFORMATION**

Surface water will be made available for transfer from the Company's groundwater substitution program, consistent with the current Draft Technical Information for Preparing Water Transfer Proposals, dated December 2015 (Draft Technical Information) published by the Department of Water Resources (DWR) and the U.S. Bureau of Reclamation (Reclamation). The Draft Technical Information has been developed to address the concerns of DWR and Reclamation relative to the potential impacts that water transfers may have on other legal users, instream beneficial uses, and the overall economy and environment. The Company will submit a proposal(s) to DWR for a water transfer to the SWC Agencies during 2018, which includes detailed information relative to historical groundwater pumping, groundwater well characteristics, groundwater monitoring and reporting elements, and associated maps. DWR will conduct an extensive review of these documents in order to ensure that the quantity of water proposed to be made available by the Company meets the relevant criteria to demonstrate a reduction in surface water use will occur as a result of the proposed temporary transfer. Absent the proposed temporary transfer to the SWC Agencies, groundwater would not be pumped by the Company for its groundwater substitution program to make surface water available for the SWC Agencies; thus, the Company would have diverted surface water to meet its irrigation demands.

Only wells which have been approved by DWR will be used for the proposed temporary transfer. In accordance with Water Code Section 1745.10, the Company does not believe the proposed transfer to the SWC Agencies by groundwater substitution will result in an overdraft of the underlying groundwater basin. As a condition of participation in the proposed temporary transfer, the Company has developed groundwater monitoring, reporting, and mitigation plans to ensure the proposed transfer does not result in any unreasonable and adverse impacts to the groundwater basin or third parties. As described above, the requirements of the monitoring program are outlined in the Draft Technical Information and

will be implemented by the Company accordingly. The program also includes review of groundwater level monitoring data relative to potential land subsidence, in accordance with the Draft Technical Information. To account for anticipated streamflow depletion, DWR will apply a factor of 24% to the amount of groundwater pumped pursuant to the Company's proposed groundwater substitution transfer in accordance with the Draft Technical Information and prior agreements between DWR and the Company. Evaluation and approval by DWR of the groundwater monitoring, reporting, and mitigation plans will be obtained for the Company's groundwater substitution program.

The boundaries of the Company are within Sutter County, which completed and submitted an Alternative Submittal to comply with the Sustainable Groundwater Management Act (SGMA) of 2014. SGMA requires that either a Groundwater Sustainability Plan or Alternative Submittal be developed for designated medium and high priority groundwater basins in California. As identified in the Alternative Submittal submitted by Sutter County, the Sutter Subbasin has been sustainably managed for a minimum period of 10 years without undesirable results, which are defined as chronic lowering of groundwater levels, depletion of groundwater storage, depletion of surface water, subsidence, sea water intrusion and degraded water quality. Groundwater levels in the Subbasin change seasonally but have been relatively stable for more than 70 years. In addition, the Company permitted DWR to install a multi-completion continuous groundwater monitoring well (DWR Well Nos. 13N03E26J002M to -005M {CASGEM ID Nos. 38952N1215992W001 to 004, respectively}) in 2010 near the center of the Company to further assist in documenting groundwater elevations. Hydrographs for this well are included in the Alternative Submittal. The monitoring results obtained from DWR for this groundwater well indicate that groundwater elevations trended upwards during the wetter years of 2016 and 2017.

As a result of the proposed temporary transfer, the flow in the Feather River downstream of the Company's present point of diversion will increase by up to 6,000 AF over what would have occurred absent the proposed transfer. These increases will occur during the period that surface water is made available by the Company or if possible, during the following months thereafter through releases by DWR for conveyance to the participating SWC Agencies. The increased flow in the Feather River to the proposed additional points of diversion and redirection will be a small percentage of the total flow and will be water that would be diverted by the Company absent this proposed transfer. The Company's reduced diversions will provide additional flows during the proposed transfer period, up to a maximum of approximately 39 cfs. Therefore, there will be no injury to other legal water users, water quality, or return flows; in fact, these increased flows may provide benefits for fisheries and wildlife and may result in a positive effect to the water users between the present point of diversion and the proposed additional point of diversion.

The Company entered into an Agreement on Diversion of Water from the Feather River with DWR (Agreement), dated May 17, 1977, for the purpose of a water rights settlement associated with the operation of Oroville Dam, specifically relative to the Company's License 2033 and its other water rights. The proposed quantity for the 2018 Water Transfer is based on a 100% supply under the Agreement with DWR. The Company's beneficial use of water from the



Garden Highway Mutual Water Company License 2033  
Attachment No. 1 to Petition for Change Involving Water Transfers

Feather River during 2018 will include diversions for its crop water demands and surface water made available for transfer by groundwater substitution. In the case that the Division issues a curtailment notice for cessation of diversions under the Company's License 2033 due to hydrologic conditions, the water transfer from the Company may occur under the Agreement with DWR. Although the Company may receive a curtailment notice for its License 2033, the Company will continue beneficial use of water in accordance with the terms of its water rights and the Agreement with DWR for the reasons identified above.

See files of the State Water Resources Control Board for more information regarding other legal water users, which may include the Delta water users, the Central Valley Project, and the SWP. The Department of Fish and Wildlife (DFW) has been contacted regarding the Petition and the initial comment provided was to identify the proposed 2018 Water Transfer and associated monitoring with the newly formed groundwater sustainability agency (GSA), pursuant to the Sustainable Groundwater Management Act that covers the area where groundwater substitution pumping is proposed to occur. The Company is within the Sutter County GSA and as part of the petition process has notified Guadalupe Rivera (530-822-7400) of Sutter County; and thus, we believe the comment has been addressed. The Central Valley Regional Water Quality Control Board (CVRWQCB) has also been contacted and were provided information regarding the proposed temporary water transfer; CVRWQCB staff are currently reviewing the Petition. Copies of this Petition have been provided to Lauren Mulloy (916-358-2909) of DFW and Michelle Snapp (916-464-4824) of the CVRWQCB for review and comment.

## ENVIRONMENTAL INFORMATION FOR PETITIONS

This form is required for all petitions.

Before the State Water Resources Control Board (State Water Board) can approve a petition, the State Water Board must consider the information contained in an environmental document prepared in compliance with the California Environmental Quality Act (CEQA). This form is not a CEQA document. If a CEQA document has not yet been prepared, a determination must be made of who is responsible for its preparation. As the petitioner, you are responsible for all costs associated with the environmental evaluation and preparation of the required CEQA documents. Please answer the following questions to the best of your ability and submit any studies that have been conducted regarding the environmental evaluation of your project. If you need more space to completely answer the questions, please number and attach additional sheets.

### DESCRIPTION OF PROPOSED CHANGES OR WORK REMAINING TO BE COMPLETED

For a petition for change, provide a description of the proposed changes to your project including, but not limited to, type of construction activity, structures existing or to be built, area to be graded or excavated, increase in water diversion and use (up to the amount authorized by the permit), changes in land use, and project operational changes, including changes in how the water will be used. For a petition for extension of time, provide a description of what work has been completed and what remains to be done. Include in your description any of the above elements that will occur during the requested extension period.

See Attachment No. 1

Insert the attachment number here, if applicable:

1

**Coordination with Regional Water Quality Control Board**

For change petitions only, you must request consultation with the Regional Water Quality Control Board regarding the potential effects of your proposed change on water quality and other instream beneficial uses. (Cal. Code Regs., tit. 23, § 794.) In order to determine the appropriate office for consultation, see: [http://www.waterboards.ca.gov/waterboards\\_map.shtml](http://www.waterboards.ca.gov/waterboards_map.shtml). Provide the date you submitted your request for consultation here, then provide the following information.

Date of Request

March 29, 2018

Will your project, during construction or operation, (1) generate waste or wastewater containing such things as sewage, industrial chemicals, metals, or agricultural chemicals, or (2) cause erosion, turbidity or sedimentation?

Yes  No

Will a waste discharge permit be required for the project?

Yes  No

If necessary, provide additional information below:

See Attachment No. 1

Insert the attachment number here, if applicable:

**Local Permits**

For temporary transfers only, you must contact the board of supervisors for the county(ies) both for where you currently store or use water and where you propose to transfer the water. (Wat. Code § 1726.) Provide the date you submitted your request for consultation here.

Date of Contact

April 4, 2018

For change petitions only, you should contact your local planning or public works department and provide the information below.

Person Contacted:  Date of Contact:

Department:  Phone Number:

County Zoning Designation:

Are any county permits required for your project? If yes, indicate type below.  Yes  No

- Grading Permit
- Use Permit
- Watercourse
- Obstruction Permit
- Change of Zoning
- General Plan Change
- Other (explain below)

If applicable, have you obtained any of the permits listed above? If yes, provide copies.  Yes  No

If necessary, provide additional information below:

Not Applicable.

Insert the attachment number here, if applicable:

**Federal and State Permits**

Check any additional agencies that may require permits or other approvals for your project:

- Regional Water Quality Control Board       Department of Fish and Game
- Dept of Water Resources, Division of Safety of Dams       California Coastal Commission
- State Reclamation Board       U.S. Army Corps of Engineers       U.S. Forest Service
- Bureau of Land Management       Federal Energy Regulatory Commission
- Natural Resources Conservation Service

Have you obtained any of the permits listed above? If yes, provide copies.       Yes       No

For each agency from which a permit is required, provide the following information:

Agency	Permit Type	Person(s) Contacted	Contact Date	Phone Number
Not Applicable.				

If necessary, provide additional information below:

Not Applicable.

Insert the attachment number here, if applicable:

**Construction or Grading Activity**

Does the project involve any construction or grading-related activity that has significantly altered or would significantly alter the bed, bank or riparian habitat of any stream or lake?       Yes       No

If necessary, provide additional information below:

Not Applicable.

Insert the attachment number here, if applicable:

**Archeology**

Has an archeological report been prepared for this project? If yes, provide a copy.  Yes  No

Will another public agency be preparing an archeological report?  Yes  No

Do you know of any archeological or historic sites in the area? If yes, explain below.  Yes  No

If necessary, provide additional information below:

Not Applicable.

Insert the attachment number here, if applicable:

**Photographs** See Attachment No. 1

For all petitions other than time extensions, attach complete sets of color photographs, clearly dated and labeled, showing the vegetation that exists at the following three locations:

- Along the stream channel immediately downstream from each point of diversion
- Along the stream channel immediately upstream from each point of diversion
- At the place where water subject to this water right will be used

**Maps** See Attachment No. 1

For all petitions other than time extensions, attach maps labeled in accordance with the regulations showing all applicable features, both present and proposed, including but not limited to: point of diversion, point of rediversion, distribution of storage reservoirs, point of discharge of treated wastewater, place of use, and location of instream flow dedication reach. (Cal. Code Regs., tit. 23, §§ 715 et seq., 794.)

Pursuant to California Code of Regulations, title 23, section 794, petitions for change submitted without maps may not be accepted.

**All Water Right Holders Must Sign This Form:**

I (we) hereby certify that the statements I (we) have furnished above and in the attachments are complete to the best of my (our) ability and that the facts, statements, and information presented are true and correct to the best of my (our) knowledge. Dated  at .

  
Water Right Holder or Authorized Agent Signature  
*DARLEEN B. CARDOVA, MBK ENGINEERS ON BEHALF OF GARDEN HIGHWAY MJC*

Water Right Holder or Authorized Agent Signature

**NOTE:**

- Petitions for Change may not be accepted unless you include proof that a copy of the petition was served on the Department of Fish and Game. (Cal. Code Regs., tit. 23, § 794.)
- Petitions for Temporary Transfer may not be accepted unless you include proof that a copy of the petition was served on the Department of Fish and Game and the board of supervisors for the county(ies) where you currently store or use water and the county(ies) where you propose to transfer the water. (Wat. Code § 1726.)

**Attachment No. 1  
to Environmental Information for  
Petition for Change Involving Water Transfers  
License 2033 (Application 1699)  
Held by Garden Highway Mutual Water Company**

DESCRIPTION OF PROPOSED CHANGES

Garden Highway Mutual Water Company (Company) is petitioning to temporarily add a point of diversion, a point of rediversion, place of use, and purposes of use to the water right identified above in order to transfer up to 6,000 AF to participating State Water Contractor (SWC) Agencies by groundwater substitution. The State Water Project's (SWP) Banks Pumping Plant is proposed to be added as a point of diversion; San Luis Reservoir is proposed to be added as a point of rediversion; and a portion of the service area of the SWP is proposed to be added as a place of use. The additional purposes of use proposed to be added are municipal, industrial, and domestic, in addition to the existing purpose of use for irrigation. These proposed additions would authorize the transfer of water to the SWC Agencies during July through September 2018. The proposed 2018 Water Transfer will provide the SWC Agencies with an additional water supply during the current drier hydrologic conditions. There is no change to the Company's existing point of diversion, place of use, or purpose of use.

The quantity of surface water proposed to be made available by groundwater substitution involves the use of groundwater pumped upon overlying lands in exchange for a like amount of surface water that will remain instream for diversion at the proposed additional point of diversion. Absent the proposed temporary transfer, the Company would have diverted the total proposed transfer quantity of 6,000 AF of surface water from the Feather River pursuant to its License 2033. The proposed temporary transfer does not involve any construction or other physical changes to the Company's facilities.

Petitions for temporary transfer of water pursuant to Water Code Section 1725 are exempt from the California Environmental Quality Act (CEQA). In accordance with the Draft Technical Information for Preparing Water Transfer Proposals, dated December 2015 published by the Department of Water Resources and U.S. Bureau of Reclamation, the Company will implement the relevant, applicable measures for the proposed 2018 Water Transfer.

PHOTOGRAPHS

The present point of diversion and the proposed additional point of diversion and point of rediversion include existing facilities that are well known and documented with the Division of Water Rights (Division). In addition, the present and proposed places of use are also well known and documented with the Division. Therefore, for these reasons, the Company respectfully requests that said documentation be made a part of the record for the petition.

MAPS

The present point of diversion and place of use are shown on a map filed with the Division for License 2033. The proposed additional point of diversion for the SWP's Banks Pumping Plant and the proposed additional point of rediversion for San Luis Reservoir are shown on maps filed with the Division for Application 5630. The proposed additional place of use is a portion of the SWP service area, as shown on Map 1878 - 1, 2, 3, and 4 on file with the Division under Application 5630. The Company respectfully requests that said maps be made a part of the record for the petition.