

Below are comments on the draft framework from Stockton East Water District.

**From:** Anthony Barkett [<mailto:ambarkett@gmail.com>]  
**Sent:** Wednesday, August 21, 2013 2:06 PM  
**To:** Scot A. Moody; Burkin, Christian  
**Subject:** Re: Framework

Christian

Thanks for taking the time to speak with me on the phone. I understand from our conversation that this is just a framework and it is a work in progress. You even suggested that the August 14th draft I am working off may have been changed already. In any event, please accept these comments on behalf of Stockton East Water District.

Section IV F states that there will be a priority for projects that produce the greatest Public Benefit yet public benefit has yet to be defined. This is a very slippery slope and if not properly defined can be used against smaller communities when competing against larger communities for funds. SEWD would suggest eliminating that statement or specifically defining the benefit under each sub section so the priority is fair and transparent.

#### Section VII Climate Change Preparedness & Regional Self Reliance

It is unclear how adapting to climate change and regional self reliance are related. It seems regional self reliance should be its own category with its own funding. The funding will be based on IRWMPs which have already been completed. It looks like a new hurdle is being placed to receive funding. If not, it needs to be cleared up and stated how much money will go for climate change and how much for regional self reliance. SEWD would suggest the vast majority go to regional self reliance.

Section B 3. should include a separate bullet point for groundwater recharge. Groundwater recharge is a vital component of many IRWMPs and definitely is for San Joaquin County's plan. Section C 1. This section states that the current regional allocations remain the same. The last water bond's allocation was not favorable to S.J. County. Our region included a large portion of the S.J river watershed which meant we were competing against several IRWMP's for limited funding.

Either more money should be allocated to the San Joaquin region or the region should be defined differently by existing IRWMPs to insure we get a fair allocation of the funds for San Joaquin County.

#### Section IX Storage for Climate Change

Once again, this headline is a little confusing. The purpose states to expand surface and groundwater storage for climate change but, what exactly does that mean? SEWD would suggest that the section be entitled for Storage and under the intent or expected benefits you could have a discussion on the positive effects it may have on climate change. Further, under funding it is stated that it will be for Public Benefits. This is also very vague and could be defined in a way that eliminates funding for many good regional groundwater storage projects. Public benefit

should be defined very broadly to include the conjunctive use of local facilities. This will allow water to be used more efficiently on a regional basis. That is a public benefit that has Statewide benefits. If not, you will be funding only large projects that benefit the Delta Exporters.

These comments are preliminary and we would like the opportunity to meet with you and Assemblywoman Eggman to discuss further as the process unfolds.

Thanks for the opportunity and feel free to contact me or Scot with any questions.  
Anthony Barkett