

From: Tom Martin [mailto:Tom@ed2.com]

Sent: Monday, October 20, 2014 2:28 PM

To: Mike Gazda

Subject: proposed Resolution 14-7

Mike,

Referencing Item #3 in the proposed resolution, I can see many problems with implementing a way to predict "pumping equivalent" load. While we recognize that the CAWCD's ag pool water will be reduced and ultimately eliminated in the future, it is not certain that CAP water won't be available from others, such as tribes who don't need their full allocations. Similarly, it may be that some land currently in agricultural production will go fallow if CAP water is unavailable, so groundwater won't be needed to the degree anticipated. It is not at all certain that groundwater pumping will replace all lost surface water. I don't see how a methodology to estimate "pumping equivalent" load can be implemented on any kind of objective basis. It would be a nightmare for the APA to try to keep track of how much land is in production year-by-year and district-by-district and then to revise allocations accordingly taking into account other available surface water supplies and crop mix.

Regards,

Tom Martin

Electrical District No. 2