

WANGER JONES HELSLEY PC
ATTORNEYS

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May 11, 2015

VIA EMAIL & UNITED STATES MAIL

George W. Uc
FRESNO COUNTY LOCAL AGENCY
FORMATION COMMISSION
2607 N. Fresno Street, Suite B
Fresno, CA 93721

**Re: Raisin City Water District: Response to Municipal
Service Review**

Dear Mr. Uc:

My law firm represents the Raisin City Water District ("RCWD") and, on its behalf, I am submitting the following response to the Fresno County Local Agency Formation Commission's (the "LAFCo") Municipal Service Review for RCWD (the "MSR"). In short, RCWD's continued existence is critically important to help address groundwater overdraft conditions in the Kings River Sub-Basin, and in particular the RCWD service area, and to help the local aquifer achieve sustainability as required under the Sustainable Groundwater Management Act of 2014 ("SGMA"). RCWD is taking affirmative steps toward these ends, and has made real and substantial progress in addressing the issues raised by the LAFCo in the MSR. As a result, RCWD respectfully requests that the LAFCo decline to initiate dissolution proceedings against RCWD and instead maintain the status quo.

The MSR raises several issues, including: (1) RCWD's administration and accountability to the public; (2) RCWD's ability to provide services to its members and its participation in other local water organizations; and (3) whether RCWD's existence is necessary because it was purportedly formed in contemplation of the construction of the Mid-Valley Canal, which did not materialize. In short, RCWD has taken decisive action to improve its administration and public participation, and is actively participating in multi-agency efforts to address groundwater overdraft within the district.

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Administration and Public Accountability. RCWD has made substantial progress in addressing the issues raised in the MSR regarding its administration and accountability to the public. These actions include, but are not limited to:

- Entering into a contract with Heintz Business Management (“Heintz”) to provide administrative services to RCWD. A copy of the agreement is enclosed as Exhibit “A.” Heintz has extensive experience assisting groups similar to RCWD, including the nearby Stinson Canal & Irrigation District.
- Retaining Oliver W. Wanger and John P. Kinsey of the Wanger Jones Helsley PC law firm to, among other things, assist RCWD not only with water law, but also with enhancing its governance to ensure compliance with California law applicable to water districts, including the Brown Act, the Public Records Act, the Political Reform Act (and related conflict of interest laws), and the California Environmental Quality Act.
- RCWD is presently considering amendments to its bylaws. Those amendments will include, *inter alia*, regular monthly meetings at a specified time and location, which will be adhered to by the RCWD board.

RCWD’s Provision of Services to the Public and Coordination With Other Agencies. RCWD disagrees with the MSR’s conclusion that it is not providing services to its members, and that RCWD does not participate in other local water organizations. For many years, RCWD has coordinated with other local agencies, and has participated in efforts to help address groundwater overdraft in the Kings River Sub-Basin:

- Since 1999, RCWD has participated in the planning process for the McMullin Recharge Project with other local agencies, including the Kings River Conservation District (“KRCD”) and Tranquility Irrigation District. When complete, the McMullin Project will result in the participating agencies’ ability to capture surface water flows of up to 150 cfs for recharge. RCWD’s participation has included funding for master planning, as reflected in the August 27, 1999, Memorandum of Understanding enclosed as Exhibit “B.” RCWD is also one of several agencies who will be jointly submitting for Integrated Regional Water Management Plan (IRWMP) funding to help develop infrastructure necessary to implement the McMullin Recharge Project.
- For many years, RCWD has actively participated in, and provided financial support for, the Kings River Conservation District (KRCD) Coordinated Groundwater Management Plan (GWMP) and the Upper Kings Basin IRWMP to help address the groundwater overdraft within the Kings River Sub-Basin.

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- In 2012, RCWD commissioned a groundwater recharge feasibility study to identify required land, water, and conveyance structures, and determine efficient, cost effective methods to replenish the groundwater supply through recharge projects. This effort shows, among other things, RCWD's commitment to exploring and funding recharge projects to benefit RCWD and its members.
- Most recently, on May 8, 2015, RCWD became a signatory to the Revised Memorandum of Understanding to Work Cooperatively to Promote Conjunctive Water Management Projects and Programs, effectively making RCWD a member of the North Fork Conjunctive Water Management Group. The purpose of this group is to, among other things, increase the availability and reliability of local ground and surface water resources in the lower Kings Basin, and to explore the formation of a groundwater sustainability agency for purposes of SGMA.
- RCWD actively continues to seek out local agency partnerships to fund and develop infrastructure necessary to bring surface water into the district during wet years for recharge.

RCWD's Continued Existence Is Critical in Light of SGMA. Although the Mid-Valley Canal may not have materialized, RCWD continues to provide important services to its members. In addition to the programs and partnerships identified above, David Orth of the Kings River Conservation District has explained, "[w]ith the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), now more than ever landowners and communities within the RCWD will benefit significantly from active representation by an overlying local water district." (See Exhibit "C.")

As a local agency, RCWD has the ability to participate with other water agencies in a groundwater sustainability agency ("GSA"), (see Water Code, § 10723.6, subd. (a)); to assist with monitoring and notification efforts; and to help raise funds to develop infrastructure necessary to achieve sustainability. RCWD's participation in a GSA is important to help other local agencies within the Kings River Sub-Basin achieve compliance with SGMA; provide funding for infrastructure and planning efforts; perform monitoring and analysis of groundwater conditions within the RCWD area; and ultimately to help the GSA meet its sustainability goal for the properties within the RCWD boundaries. Without participation by RCWD, it will be far more difficult for the RCWD area – and the Kings River Sub-Basin generally – to achieve compliance with SGMA and achieve sustainability.

RCWD has also received numerous letters of support from various constituencies within Fresno County, all of whom agree RCWD should not be dissolved. (See Ex. "D.")

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Conclusion. In short, RCWD's continued existence is more important now than ever. RCWD is ready, willing, and able to help resolve groundwater overdraft conditions in the Kings sub-basin, and has made substantial progress in that regard in a very short period of time. The dissolution of RCWD would undermine these efforts, and would leave the growers and residents within RCWD without a realistic mechanism to address overdraft conditions in the area and comply with SGMA's mandate. As a result, RCWD requests that the LAFCo decline to initiate dissolution proceedings against RCWD, and instead maintain RCWD's boundaries (and Sphere of Influence) consistent with the status quo.

Should the LAFCo have any questions regarding RCWD's response to the MSR, or need any further information regarding its ongoing efforts to address groundwater overdraft conditions, please do not hesitate to contact me.

Respectfully submitted,
WANGER JONES HELSLEY PC


John P. Kinsey

Enclosures

EXHIBIT “A”

Heintz Business Management

1100 West Shaw Avenue, Suite 148, Fresno, California 93711

(559) 229-4740 Fax (559) 229-4720

May 1, 2015

Mr. Gere Gunland, President
Raisin City Water District
P.O. Box 174
Raisin City, California 93652

Dear Gere,

In response to our recent telephone discussion this letter will confirm the terms of my engagement to provide professional services to Raisin City Water District.

As soon as possible you will deliver to my office all of the financial and administrative records of the District, including but not limited to bank records, accounting ledgers, billing statements, paid invoices, insurance policies, financial statements, tax returns, State of California public agency reports, board meeting minutes and other District records and documents of a significant nature.

I will then perform a detailed review of the District records and prepare an assessment of the current state of the District's records and its compliance with generally accepted accounting and public agency standards. The assessment will conclude with a report to the District Board of Directors with comments about my findings, recommendations for improvements to the District's systems and procedures and proposals for the effective administration of the District going forward.

The fees for my services will be billed at my normal hourly rate with the understanding that my charges for this project will not exceed \$2,500.00 without prior approval of the Board. Invoices will be submitted monthly and will be due and payable within fifteen days of presentation.

If the foregoing accurately sets forth your understanding, please sign the enclosed copy of this letter and return it to me.

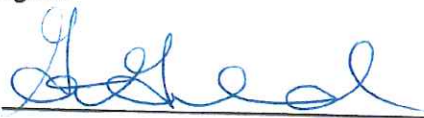
Sincerely,



Stephen C Heintz, EA

Acknowledged:

Signature



Date

5/5/15

Printed Name and Title

Russell G. Gunland, President RCWD

EXHIBIT “B”

MEMORANDUM OF UNDERSTANDING
McMullin Recharge Project

This Memorandum of Understanding is made and entered into this 27th day of August, 1999, by and between Kings River Conservation District, James Irrigation District, Mid-Valley Water District, Raisin City Water District, Tranquillity Irrigation District and Terranova Management Co. LLC. (hereafter the Parties to the MOU).

Purpose of Memorandum of Understanding

The Parties listed above have formed an informal alliance with the objective of reducing groundwater overdraft within an area of common interest through the development of a project for recharge of the groundwater within the area. The area is generally within the northwestern portion of Kings River Conservation District Groundwater Management Area A (which includes Mid-Valley and Raisin City Water Districts) and James and Tranquillity Irrigation Districts. It includes approximately 148,500 acres of land, most of which is developed for irrigated agriculture. Approximately 112,000 acres, or 75 percent of the area, is almost entirely dependent upon groundwater. This has resulted in an overdraft of the groundwater in the area in excess of 30,000 acre-feet per year.

To organize the development of the project, a Master Plan will be prepared. The Master Plan will serve as the guide for the development of the project, but it is not intended to prevent or interfere with the independent planning or construction of groundwater recharge facilities by any of the Parties. The Master Plan will be flexible in that changes may be made from time to time with the concurrence of a majority of the participating parties.

The purpose of this Memorandum of Understanding (MOU) is to define the level of participation and cost sharing responsibility of each Party in the preparation of the Master Plan.

Organization of the Parties to the MOU

To the extent feasible, the aforementioned organizing Parties will notify and seek participation from others encompassed in the geographic area generally described above, or at least to the best of their collective ability, inform all such potential participants about the scope and nature of this effort.

Allocation of Tasks

The Kings River Conservation District will serve as the lead agency in developing the scope of work for the preparation of the Master plan for the Project.

A Steering Committee, composed of one representative appointed by each Party that is signatory to this MOU, shall be formed. The Kings River Conservation District Committee member shall serve as Chairman. The Committee will review and approve the outline and cost estimate of work to be done in the preparation of the Master Plan, and shall meet as often as it deems necessary to review progress and to give guidance on the development and completion of the Master Plan.

Participation in Steering Committee meetings is open to all in the geographic area encompassed in the description above. Outside the area, participation is encouraged to the extent such participation is beneficial to both parties, however, such participation is limited to observation and comment as to the potential impact of the activities on such areas.

Cost-Sharing

Following the finalization of the outline of the scope of work and the cost estimate for the preparation of the Master Plan the Parties will meet and agree on the cost-sharing of the costs of preparation of the Master Plan. To the extent possible, all existing studies, designs and data will be incorporated into the Master Plan effort. Furthermore, existing fully designed projects will be given preference for implementation when and if funds become available for such implementation.

Schedule

It is anticipated that, barring undue delays, all work on preparation of the Master Plan will be completed within six months of execution of this MOU.

Term

Following completion of the Master Plan and its acceptance by all Parties, a new memorandum of understanding or similar agreement may be prepared in order to implement the work outlined by the Master Plan.

Termination

Any Party to this MOU may terminate its participation by written notice to the other participants. The termination shall be effective 30 calendar days after the termination notice is received by all the other Parties, or on such earlier date as the Parties may agree upon in writing. The MOU shall remain in effect as long as two participants remain.

Authorization

Each individual executing this MOU on behalf of a Party represents and warrants that he/she has been duly authorized by all required action of the indicated party to execute this MOU on behalf of such Party.

Counterparts

This MOU may be executed in counterparts, and all original signature pages may be combined to form a single document.

IN WITNESS WHEREOF, the parties have executed this MOU as of the date first above written.

KINGS RIVER CONSERVATION DISTRICT

By: Jeff L. Sigler
Its: General Manager

JAMES IRRIGATION DISTRICT

By: _____
Its: _____

MID-VALLEY WATER DISTRICT

By: _____
Its: _____

RAISIN CITY WATER DISTRICT

By: _____
Its: _____

TRANQUILLITY IRRIGATION DISTRICT

By: _____
Its: _____

TERRANOVA MANAGEMENT CO. LLC.

By: _____
Its: _____

IN WITNESS WHEREOF, the parties have executed this MOU as of the date first above written.

KINGS RIVER CONSERVATION DISTRICT

By: _____

Its: _____

JAMES IRRIGATION DISTRICT

By: Martin Barcellos

Its: PRESIDENT

MID-VALLEY WATER DISTRICT

By: _____

Its: _____

RAISIN CITY WATER DISTRICT

By: _____

Its: _____

TRANQUILLITY IRRIGATION DISTRICT

By: _____

Its: _____

TERRANOVA MANAGEMENT CO. LLC.

By: _____

Its: _____

IN WITNESS WHEREOF, the parties have executed this MOU as of the date first above written.

KINGS RIVER CONSERVATION DISTRICT

By: _____

Its: _____

JAMES IRRIGATION DISTRICT

By: _____

Its: _____

MID-VALLEY WATER DISTRICT

By:  _____

Its: President _____

RAISIN CITY WATER DISTRICT

By: _____

Its: _____

TRANQUILLITY IRRIGATION DISTRICT

By: _____

Its: _____

TERRANOVA MANAGEMENT CO. LLC.

By: _____

Its: _____

IN WITNESS WHEREOF, the parties have executed this MOU as of the date first above written.

KINGS RIVER CONSERVATION DISTRICT

By: _____

Its: _____

JAMES IRRIGATION DISTRICT

By: _____

Its: _____

MID-VALLEY WATER DISTRICT

By: _____

Its: _____

RAISIN CITY WATER DISTRICT

By: *Jerry R. Bow*

Its: *President*

TRANQUILLITY IRRIGATION DISTRICT

By: _____

Its: _____

TERRANOVA MANAGEMENT CO. LLC.

By: _____

Its: _____

IN WITNESS WHEREOF, the parties have executed this MOU as of the date first above written.

KINGS RIVER CONSERVATION DISTRICT

By: _____

Its: _____

JAMES IRRIGATION DISTRICT

By: _____

Its: _____

MID-VALLEY WATER DISTRICT

By: _____

Its: _____

RAISIN CITY WATER DISTRICT

By: _____

Its: _____

TRANQUILLITY IRRIGATION DISTRICT

By: James M. Fairless

Its: BOARD PRESIDENT

TERRANOVA MANAGEMENT CO. LLC.

By: _____

Its: _____

IN WITNESS WHEREOF, the parties have executed this MOU as of the date first above written.

KINGS RIVER CONSERVATION DISTRICT

By: _____

Its: _____

JAMES IRRIGATION DISTRICT

By: _____

Its: _____

MID-VALLEY WATER DISTRICT

By: _____

Its: _____

RAISIN CITY WATER DISTRICT

By: _____

Its: _____

TRANQUILLITY IRRIGATION DISTRICT

By: _____

Its: _____

TERRANOVA MANAGEMENT CO. LLC.

By: Don J. Carrasco

Its: Manager

EXHIBIT “C”



4886 East Jensen Avenue
Fresno, California 93725

Tel: 559-237-5567
Fax: 559-237-5560

www.krcd.org

May 7, 2015

Mr. Don Cameron, Board Member
Raisin City Water District
1100 West Shaw, Suite 148
Fresno, CA 93711

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Cameron:

Kings River Conservation District (KRCD) understands that Raisin City Water District (RCWD) has recently undergone a Municipal Service Review (MSR) by the Fresno County Local Agency Formation Commission (Fresno LAFCo) which has resulted in a recommendation to initiate dissolution proceedings against the RCWD. We strongly disagree with Fresno LAFCo's recommendation and are highly supportive of the established existence of the RCWD in order to continue on as an important partner in achieving groundwater sustainability in the lower Kings Subbasin and beyond.

As you are aware, the RCWD has a long history of collaborating with KRCD and other local and regional agencies to perform studies and implement projects to address groundwater issues. Over the years efforts undertaken by RCWD have included participation in and financial support of regional planning efforts such as groundwater management plan and hydrologic model development, preparation and adoption of the Kings Basin Integrated Regional Water Management Plan, and partnership with KRCD on a number of implementation projects that address groundwater issues common to our two boundaries.

With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), now more than ever landowners and communities within the RCWD will benefit significantly from active representation by an overlying local water district. As a local water agency the RCWD is eligible to participate in a Groundwater Sustainability Agency formation and plan development processes. Through your district's participation in various SGMA coordination meetings, it is clear that RCWD can and should play a critical role in achieving sustainability for the local aquifer both through SGMA and other efforts.

BOARD OF DIRECTORS

Division I, NORMAN B. WALDNER, Dinuba • Division II, MASARU YOSHIMOTO, Fowler • Division III, GILDO NONINI, Fresno • Division IV, MARK C. MCKEAN, Riverdale
Division V, D. PAUL STANFIELD, Hanford • Division VI, CEIL W. HOWE, JR., Stratford • Division VII, DR. DAVID CEHRS, Sanger

OFFICERS

DR. DAVID CEHRS, President • D. PAUL STANFIELD, Vice President • DAVID ORTH, General Manager-Secretary • RANDY SHILLING, Auditor

Mr. Don Cameron
May 7, 2015
Page 2

In conclusion, KRCD is in support of maintaining the established existence of the RCWD and is hopeful that Fresno LAFCo foregoes initiating dissolution proceedings.

Sincerely,


David Orth,
General Manager

DO/RS/EO/dmr

L15-0062
File: 300.103

CC:
George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

EXHIBIT “D”

More-Gun Farms
M.C. Gunlund
3510 W. Saginaw Avenue
Caruthers, CA 93609
559.864.8186

May 10, 2015

Via Email & United States Mail

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of More-Gun Farms to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. More-Gun Farms is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

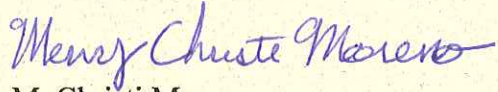
I believe that dissolution of Raisin City Water District will be devastating to our farming operation, as we do not have the financial leverage to create any type of project to meet the upcoming requirements of the Sustainable Groundwater Management Act.

More-Gun Farms disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, More-Gun Farms respectfully requests that the District decline to initiate dissolution proceedings against the Raisin City Water District, and instead maintain the status quo.

Respectfully submitted,

A handwritten signature in blue ink that reads "M. Christi Moreno". The signature is written in a cursive, flowing style.

M. Christi Moreno

More-Gun Farms

Forst-Moregun, LLC
Anden-Moregun, LLC
3510 W. Saginaw Avenue
Caruthers, CA 93609

May 10, 2015

Via Email & United States Mail

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. I am a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

With current legislation regarding ground water sustainability we believe that the ability of Raisin City Water District to negotiate and form partnerships to create recharge plans is something that individual growers are not economically able to do.

I strongly disagree with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, I respectfully request that the LAFCo decline to initiate dissolution proceedings against the Raisin City Water District, and instead maintain the status quo.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'R.G. Gunlund', with a stylized, cursive script.

R.G. Gunlund

Forst-Moregun LLC

Anden-Moregun, LLC

H&R Gunlund Ranches, Inc.
3510 W. Saginaw Avenue
Caruthers, CA 93609

May 5, 2015

Via Email & United States Mail

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of H&R Gunlund Ranches, Inc. to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. H&R Gunlund Ranches, Inc. is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

With current legislation regarding ground water sustainability we believe that the ability of Raisin City Water District to negotiate and form partnerships to create recharge plans is something that individual growers are not economically able to do.

H&R Gunlund disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, H&R Gunlund Ranches, Inc. respectfully requests that the LAFCo decline to initiate dissolution proceedings against the Raisin City Water District, and instead maintain the status quo.

Respectfully submitted,

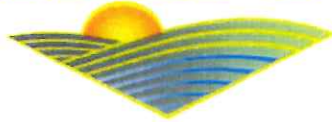
A handwritten signature in blue ink, appearing to read "Russell G. Gunlund", with a long horizontal flourish extending to the right.

Russell G. Gunlund

Vice-President

H&R Gunlund Ranches, Inc.

CAMPOS



Family Farms, LLC

May 8, 2015

Via Email & United States Mail

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Campos Family Farms, LLC to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Campos Family Farms, LLC is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Our operation in Fresno County consists of farming almonds, walnuts and vines.

Campos Family Farms, LLC disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Campos Family Farms, LLC respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Fermin M. Campos
Member

4726 W. Jacquelyn Ave. • Fresno, California 93722
Office (559) 275-3000 • Fax (559) 275-3008

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of C.S. Bath & Sons to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Lakshvir K. Sidhu is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

C.S. Bath & Sons disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, C.S. Bath & Sons respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Lakshvir K. Sidhu

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Baljeet & Lakhvir Sidhu to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Baljeet S. Sidhu is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Baljeet & Lakhvir Sidhu disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Baljeet & Lakhvir Sidhu respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Baljeet Sidhu

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of K&G Bath FLP to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Kamwarjit S. Bath is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

K&G Bath, FLP disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, K&G Bath FLP respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,



George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: **Municipal Service Review: Raisin City Water District**

Dear Mr. Uc:

I am writing on behalf of Charanjit S. Batth FLP to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Charanjit S. Batth is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Charanjit S. Batth FLP disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Charanjit S. Batth FLP respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Charanjit S. Batth

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of R & G. Bath Farms to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Gagandip S. Bath is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

R & G. Bath Farms disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, R & G. Bath Farms respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,



George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: **Municipal Service Review: Raisin City Water District**

Dear Mr. Uc:

I am writing on behalf of Bath Dehydrator to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Raninder K. Bath is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Bath Dehydrator disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Bath Dehydrator respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Raninder K. Bath

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: **Municipal Service Review: Raisin City Water District**

Dear Mr. Uc:

I am writing on behalf of Joginder S. Dhaliwal to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Joginder S. Dhaliwal is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Joginder S. Dhaliwal disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Joginder S. Dhaliwal respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

JOGINDER S. DHALI WAL

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Ranjit Bhullar to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Ranjit Bhullar is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Ranjit Bhullar disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Ranjit Bhullar respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Ranjit S. Bhullar



County of Fresno

VICE CHAIRMAN
BOARD OF SUPERVISORS
SUPERVISOR BUDDY MENDES – DISTRICT FOUR

May 8, 2015

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, California 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

As a member of the Fresno County Board of Supervisors representing District 4 which includes the community of Raisin City, I am writing this letter in regards to the Fresno County Local Agency Formation Commission's (LAFCo) recent Municipal Service Review (MSR) of the Raisin City Water District (District) which has resulted in a recommendation to initiate dissolution proceedings against the District. I strongly disagree with the MSR's recommendation.

With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the Raisin City Water District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

I respectfully request that LAFCo decline to initiate dissolution proceedings against the Raisin City Water District, and instead maintain the status quo. Thank you for your consideration in this matter. If I can be of further assistance please contact my office at (559) 600-4000.

Respectfully submitted,

Supervisor Buddy Mendes, Vice Chairman
Fresno County Board of Supervisors
District 4

Burrell • Caruthers • Coalinga • Del Rey • Five Points • Fowler • Huron • Kingsburg • Lanare
Laton • Malaga • Orange Cove • Parlier • Raisin City • Reedley • Riverdale • Sanger • Selma



IRRIGATION & CHEMICALS

POST OFFICE BOX 160 • CARUTHERS, CALIFORNIA 93609

May 11 2015

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Trenton Vineyards to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Trenton Vineyards is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Trenton Vineyards leases and farms 240 acres of table grapes. This business employs over 100 part-time employees and sustains 10 full time employees throughout the year. Along with Trenton Vineyards I also own Watson AG. Watson AG is a business that supplies all of the irrigation and fertilization needs of growers around the valley. This business employs over 50 full-time employees directly affects many growers in this district

Trenton Vineyards disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.



IRRIGATION & CHEMICALS

POST OFFICE BOX 160 • CARUTHERS, CALIFORNIA 93609

In short, Trenton Vineyards respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jerry Watson".

Jerry Watson

Trenton Vineyards



J&L Vineyards

7455 W Lincoln Ave, Fresno, CA 93706
(559) 237-2425 • jacobsen@jlvineyards.com

May 11, 2015

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

On behalf of J&L Vineyards, I offer the following comments on the Fresno County Local Agency Formation Commission's (LAFCo) Municipal Service Review (MSR) for Raisin City Water District (District). J&L Vineyards is family farm grape operation within the District, and we disagree with the MSR's recommendation that LAFCo initiate dissolution proceedings against the District.

We disagree with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensively upon groundwater to irrigate their lands. If the District dissolves, LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, J&L Vineyards respectfully requests that LAFCo decline to initiate dissolution proceedings against the District, and, instead, allow the District to continue its forward progress under the "status quo" option. Please contact me with any questions.

Sincerely,

Ryan Jacobsen
Partner

Boren Family Partnership
10129 S. Jameson Ave.
Fresno, CA 93706
Telephone (559)268-7055

May 10, 2015

Via Email & United States Mail

George W. Uc
Fresno County Local Area Formation Commission
2607 N. Fresno St., Suite B
Fresno, CA 93721

Re: **Municipal Service Review: Raisin City Water District**

Dear Mr. Uc:

I am writing on behalf of Boren Family Partnership (BFP) to submit comments on the Fresno County Local Area Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. BFP is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

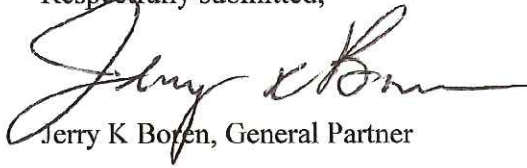
BFP has been a raisin grower in the District for 25+ years during which time we have provided direct employment for many people together with the purchase of chemical/fertilizers, equipment, supplies, equipment maintenance, as well as many other services, all of which has been a positive impact upon businesses in Fresno County.

BFP disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo". With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensively upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Boren Family Partnership respectfully requests that the dissolution proceedings against the District not be initiated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jerry K Boren". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jerry K Boren, General Partner

Ray Moles Farms/ Sun Valley Raisins
9595 S. Hughes Ave
Fresno, Ca. 93706

May 11, 2015

Via Email & United States Mail

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Ray Moles Farms to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Ray Moles Farms is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Ray Moles Farms/ Sun Valley Raisins owns approximately 700 acres and leases 450 acres. Also employees 130 full time employees. And reaches up to 600 employees during harvest seasons.

Ray Moles Farms/ Sun Valley Raisins disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Ray Moles Farms/ Sun Valley Raisins respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Ray Moles, Owner



Harguindeguy Family Farms
5665 N Van Ness
Fresno, CA 93711

May 8, 2015

Via Email & United States Mail

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Harguindeguy Family Farms to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Harguindeguy Family Farms is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

We have farmed this land since the early 50's. Through the years, we have employed over 100 workers and have grown crops such as cotton, tomatoes, alfalfa, grazing land for sheep, and pistachio trees. We always ensure that we use good farming practices and contribute to the local farm economy.

Harguindeguy Family Farms disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Harguindeguy Family Farms respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Jeanne Harguindeguy, Yvonne Harguindeguy, Anna Harguindeguy, Marianne Harguindeguy

Partners, Harguindeguy Family Farms

Lone Oak Farms

5/11/15

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: **Municipal Service Review: Raisin City Water District**

Dear Mr. Uc:

I am writing on behalf of Lone Oak Farms to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Lone Oak Farms is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Lone Oak Farms has been in business for nearly 10 years at the corner of Mc Mullin Grade and Madera Ave. We employ 30 people, some of which live in Raisin City.

Lone Oak Farms disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Lone Oak Farms respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,



Bernard te Velde

Owner of Lone Oak Farms

Gurnek S. Rai
14176 S. Fowler Ave
Selma, CA 93662

5-11-15

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Gurnek S. Rai to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Gurnek is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Gurnek farms roughly 600 acres in the district and employs 3 full time employees and hundreds seasonally. All three employees have families within the district that go to school. Gurnek disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Gurnek respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Gurnek S. Rai

Sundip S. Rai
Jusdip S. Rai
14176 S. Fowler Ave
Selma, CA 93662

5-11-15

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Sundip & Jusdip Rai ^(Jerry) to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Sundip & Jerry is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.


Sundip & Jerry Farm approximately 300 acres in RCWD. We employ 3 employees and use services of multiple businesses & their services in our operation.

Sundip & Jerry disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Jerry & Sundip respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,


Sundip S. Rai

Antar S. Gill

511115

P.O. Box 67

Caruthers, CA 93609

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Antar S. Gill to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Antar S. Gill is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Antar Gill farms 300 acres in Raisin City Water

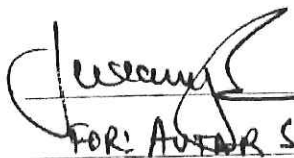
District and is the proprietor of Gill Insurance.

Gill Insurance and Farms help provide jobs, service, and food through-
Antar S. Gill disagrees with the MSR's conclusion that "it is neither local nor efficient out the valley.
to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Antar S. Gill respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,


FOR: Antar S. Gill

Duane Bettencourt

3118 W. Mt. View

Crowthers, Calif. 93609 5-11-15

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Duane to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Duane is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Duane disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Duane respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Duane Bettencourt

Bahadar Mahil
2511 W. Noble Ave
Caruthers, CA 93609

5-10-15

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Bahadar & Rupinder Family Trust to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. B&R Family Trust is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

We feel its in our best interest the water district stays intact to represent us as ground water legislation progressing

B&R Family Trust disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, B&R Family Trust respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

Bahadar Singh Mahil.
Rupinder

Makhan Pursawal
5642 W. Palo Alto Ave
Fresno, CA 93722

5/10/15

George W. Uc
Fresno County Local Agency Formation Commission
2607 N. Fresno Street, Suite B
Fresno, CA 93721

Re: Municipal Service Review: Raisin City Water District

Dear Mr. Uc:

I am writing on behalf of Makhan Pursawal to submit comments on the Fresno County Local Agency Formation Commission's Municipal Service Review (MSR) for Raisin City Water District. Makhan Pursawal is a grower within the District, and strongly disagrees with the MSR's recommendation that the LAFCo initiate dissolution proceedings against the District.

Makhan Pursawal disagrees with the MSR's conclusion that "it is neither local nor efficient to continue the status quo." With the enactment of the Sustainable Groundwater Management Act of 2014 (SGMA), it is more important than ever for growers within the District to be represented by a local agency that can participate in a Groundwater Sustainability Agency, and help achieve sustainability for the local aquifer.

Growers within the District have historically been required to rely extensive upon groundwater to irrigate their lands. If the District dissolves, the LAFCo will remove a powerful vehicle through which growers within the District can help achieve sustainability. As a local agency representing numerous landowners, the District has the capability of entering into partnerships with other agencies within the sub-basin to reduce overdraft conditions. The District can also raise funds to develop infrastructure and bring surface water into the District in wet years. I understand these efforts are well underway.

In short, Makhan Pursawal respectfully requests that the District decline to initiate dissolution proceedings against the District, and instead maintain the status quo.

Respectfully submitted,

