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January 4, 2015

Via Email and First Class Mail

State Water Resources Control Board
Division of Water Rights
Attn: California WaterFix Hearing Staff
P.O. Box 2000
Sacramento, CA 95812-2000
Email: CWFhearing@waterboards.ca.gov

Re: Placer County Water Agency's Protest and Notice of Intent to Appear -
California WaterFix Petition for Change Hearing

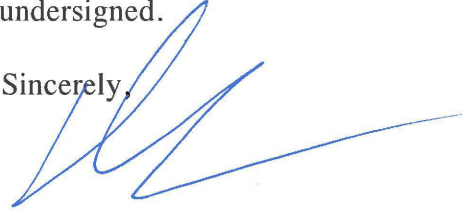
Dear California WaterFix Hearing Staff:

Protestant Placer County Water Agency (PCWA) hereby submits the enclosed Protest, and accompanying Notice of Intent to Appear, related to the Department of Water Resources' and the United States Bureau of Reclamation's water rights change petition for the California WaterFix Project. As explained in the enclosed protest, PCWA has previously coordinated and collaborated with other North State Water Alliance (NSWA) and American River Water Agency (ARWA) parties in preparing and submitting detailed comments on the Bay-Delta Conservation Plan Draft EIR/EIS (DEIR/EIS), and the California Water Fix Recirculated DEIR/Supplemental DEIS (RDEIR/SDEIS). PCWA will similarly be coordinating with the NSWA and ARWA parties to present consolidated cases-in-chief on certain common issues (e.g., analysis of hydrologic modeling relating to the issue of whether the Petitioners have established that the requested changes will not operate to the injury of any legal user of the water involved; analysis of whether the requested changes will unreasonably affect fish and wildlife; etc.). In this regard, PCWA and the NSWA and ARWA parties have identified in their respective Notices of Intent to Appear certain expert witnesses that will be providing testimony to support their respective protests, and to support their consolidated cases-in-chief on certain common issues. Please also note that other parties, with concerns similar to those of the NSWA and ARWA parties, may also adopt, in whole or in part, these expert witnesses' testimony to support their respective protests. As such, these experts may also be listed on those other parties' Notices of Intent to Appear.

State Water Resources Control Board
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If you have any questions regarding the enclosed Protest or Notice of Intent to Appear, please do not hesitate to contact the undersigned.

Sincerely,



Daniel Kelly, Attorney
Authorized Representative

DK:yd
Enclosure(s)

cc: Amy Aufdemberge (w/encls.)
James Mizell (w/encls.)

State of California
State Water Resources Control Board
DIVISION OF WATER RIGHTS
P. O. Box 2000, Sacramento, CA 95812-2000
Info: (916)341-5300, FAX (916)341-5400, Web: <http://www.waterboards.ca.gov/waterrights>

PROTEST – PETITION

This form may also be used for objections

**PETITION FOR TIME EXTENSION, CHANGE, TEMPORARY URGENT CHANGE
OR TRANSFER ON**

APPLICATION ____ PERMIT ____ LICENSE ____ (see Attachment, Item 1)

**of the California Department of Water Resources (“DWR”) and the United States
Department of the Interior, Bureau of Reclamation (“Reclamation”)**

I (We) have carefully read the NOTICE OF PETITION, REQUESTING CHANGES IN WATER RIGHTS OF THE DEPARTMENT OF WATER RESOURCES AND U.S. BUREAU OF RECLAMATION FOR THE CALIFORINA WATERFIX PROJECT, dated October 30, 2015

Address, email address and phone number of protestant or authorized agent:

Protestant:

**Andrew Fecko, Director of Resource Development
Placer County Water Agency
144 Ferguson Road
Auburn, CA 95604
E-mail: afecko@pcwa.net
Phone: (530) 823-4850**

Authorized Representative:

**Daniel Kelly
Somach Simmons & Dunn
500 Capitol Mall, Suite 1000
Sacramento, CA 95814
Email: dkelly@somachlaw.com
Phone: 916-446-7979**

Supplemental sheets are attached. To simplify this form, all references herein are to protests and protestants although this form may be used to file comments on temporary urgent changes and transfers.

**Protest based on ENVIRONMENTAL OR PUBLIC INTEREST CONSIDERATIONS
(Prior right protests should be completed in the section below):**

- the proposed action would not best serve the public interest
- the proposed action would be contrary to law
- the proposed action would have adverse environmental impacts

State facts which support the foregoing allegations: **see Attachment, Item 2**

Under what conditions may this protest be disregarded and dismissed? (Conditions should be of a nature that the petitioner can address and may include mitigation measures.) **see Attachment Item 3**

Protest based on INJURY TO PRIOR RIGHTS:

To the best of my (our) information and belief the proposed change or transfer would result in injury as follows: **see Attachment, Item 4**

Protestant claims a right to the use of water from the source from which petitioners are diverting, or propose to divert, which right is based on (identify type of right protestant claims, such as permit, license, pre-1914 appropriative right or riparian right): **see Attachment, Item 5**

List permit or license or statement of diversion and use numbers, which cover your use of water (if adjudicated right, list decree): **see Attachment, Item 5**

Where is your diversion point located? **see Attachment, Item 5**

If new point of diversion is being requested, is your point of diversion downstream from petitioners' proposed point of diversion? **see Attachment, Item 5**

The extent of present and past use of water by protestant or its predecessors in interest is as follows: **see Attachment, Item 5**

Under what conditions may this protest be disregarded and dismissed? **see Attachment, Item 3**

All protests must be signed by the protestant or authorized representative:

Signed: _____ Date: 1/9/16

All protests must be served on the petitioner. Provide the date served and method of service used: **see Attachment Item 6**

ATTACHMENT TO PLACER COUNTY WATER AGENCY'S PROTEST TO WATER RIGHTS CHANGE PETITION OF DWR AND RECLAMATION FOR CALIFORNIA WATERFIX PROJECT

Introduction

Placer County Water Agency (PCWA) has previously coordinated and collaborated with other North State Water Alliance (NSWA) parties and other American River Water Agency (ARWA) parties preparing and submitting detailed comments on the Bay-Delta Conservation Plan Draft EIR/EIS (DEIR/EIS), and the California Water Fix Recirculated DEIR/Supplemental DEIS (RDEIR/SDEIS). Protestant similarly will be coordinating with the other NSWA and ARWA parties to present consolidated cases-in-chief during the SWRCB's hearing on certain common issues, including issues regarding whether the requested changes would operate to the injury of any legal user of the water involved and whether the requested changes would unreasonably affect fish and wildlife. Consistent with this approach, Protestant and the other NSWA and ARWA parties have identified in their respective Notices of Intent to Appear both witnesses who will be providing testimony to support their individual protests and witnesses who will be providing testimony on certain common issues.

Item 1 (Petitioners' Permits)

DWR: Permits 16478, 16479, 16481 and 16482 (Applications 5630, 14443, 14445A, 17512)

Reclamation: Permits 11315, 11316, 11967, 11968, 11969, 11971, 11973, 12364, 12721, 12722 and 12723 (Applications 13370, 13371, 5628, 15374, 15375, 16767, 17374, 17376, 5626, 9363 and 9364)

Item 2 (facts supporting protest based on environmental or public interest considerations)

Water Code section 1701.2, subdivision (c), requires a water rights change petition to include "all information reasonably available to the petitioner, or that can be obtained from the Department of Fish and Game, concerning the extent, if any, to which fish and wildlife would be affected by the change, and a statement of any measures proposed to be taken for the protection of fish and wildlife in connection with the change."

Although the supplement to DWR's and Reclamation's August 25, 2015 Petition (the "Petition") contains some general statements about the California WaterFix Project's alleged benefits to fish and wildlife (see Petition Supplement, pp. 14-15), the Petition does not contain sufficient information to satisfy the requirements of Water Code section 1701.2, subdivision (c).

The Petition does not discuss any of the evidence presented in PCWA's July 28, 2014 comments on the DEIR/DEIS, PCWA's October 30, 2015 comments on the RDEIR/SDEIS, NSWA's July 28, 2014 comments on the DEIR/DEIS or in NSWA's October 30, 2015 comments on the RDEIR/SDEIS. That evidence describes in great detail the adverse effects that the proposed California WaterFix Project would have on fish and wildlife.

Among other things, PCWA's comments include detailed comments by Cardno, which concluded that modeled CVP/SWP operations resulted in significant adverse effects to upstream resources, including CV steelhead and fall-run Chinook salmon in the LAR relative to the existing conditions (environment).

NSWA's comments include detailed comments by fisheries expert Dave Vogel, which concluded that the California WaterFix Project would cause catastrophic adverse impacts on anadromous salmonids. Most notably, because of the proposed Project intakes' locations on the Sacramento River, there would not be sufficient sweeping velocities to avoid impingement of fish against the intake screens and associated injuries. The estimated fish exposure times in front of the proposed intakes (which is a measure of the threat to migrating salmonids) are very long, especially in comparison to exposure times for other fish screens in California.

NSWA's comments also include expert analyses by Professor Robert Latour, which describes how operation of the proposed new California Water Fix diversion facilities would have adverse impacts on Delta smelt life stages, including survival, growth, maturation schedules, and reproductive success over short, medium and long time periods. The Petition does not discuss any of this information and instead simply states that the proposed new points of diversion would be located outside of the primary habitat of Delta smelt and longfin smelt. (Petition Supp., at pp. 7-8.)

NSWA's comments also state that operation of the California WaterFix Project's proposed north Delta diversion could adversely affect Sacramento Valley waterfowl and the Pacific Flyway by reducing diversions of water in the Sacramento Valley that support avian habitat values on both irrigated cropland and wetlands. Mark Petrie of Ducks Unlimited described these impacts in detail in his comments submitted to the State Water Resources Control Board in 2012. (See http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/docs/comments111312/mark_petrie.pdf.)

Item 3 (conditions under which this protest may be dismissed)

Protestant is working with the other NSWA and ARWA parties to develop proposed conditions for DWR's and Reclamation's water right permits that would be sufficient to allow protestant to dismiss its protest. Protestant and the NSWA and ARWA parties plan to submit those proposed conditions for or during the SWRCB's hearing on DWR's and Reclamation's Petition. In general, those conditions would require DWR and Reclamation to operate the State Water Project and the Central Valley Project in a manner that would eliminate the potential impacts described in Items

2 and 4 of this protest by avoiding adverse impacts associated with reduced storage in Folsom Reservoir, avoiding adverse impacts to water supplies in the American River basin, and by avoiding adverse impacts to environmental resources in the American River basin.

Item 4 (facts supporting protest based on injury to prior rights)

PCWA, and the NSWA and ARWA parties divert and use water under various water right permits and licenses, pre-1914 appropriative and riparian rights, and contracts with DWR and Reclamation. PCWA's specific rights are described in Attachment Item 5.

If the SWRCB were to grant DWR's and Reclamation's water rights change petition, and if DWR and Reclamation then were to operate the State Water Project ("SWP") and Central Valley Project ("CVP") to divert and re-divert water at the proposed new points of diversion, then PCWA and the other NSWA and ARWA parties could be injured in several ways, including the following: (a) the new operations of the SWP and CVP could result in lower SWP and CVP settlement contract and water service contract water supplies being available for diversion and use by PCWA and the other NSWA and ARWA parties than would occur without the California WaterFix project; (b) these new operations could change the amounts of storage in SWP and CVP reservoirs and the flows in rivers controlled by the SWP and CVP, and as a result, could create physical limitations on the abilities of PCWA and the other NSWA and ARWA parties to divert water under their SWP and CVP contracts, their Warren Act and other contracts or their water rights; and (c) the new Delta flow criteria required by Water Code section 85086, subdivision (c)(2) could be incorporated into a revised Bay/Delta Water Quality Control Plan, and PCWA and the other NSWA and ARWA parties could be required to contribute to the implementation of those new requirements.¹ If the SWRCB issues an order approving DWR's and Reclamation's petition, then the order should include sufficient conditions on DWR's and Reclamation's operations of the SWP and CVP to assure that such potential injuries to PCWA and the other NSWA and ARWA parties will not occur.

Water Code section 1702 provides that, before the SWRCB may issue an order granting a water rights change petition, "the petitioner must establish, to the satisfaction of the board, and it shall find, that the change will not operate to the injury of any legal user of the water involved." To meet the requirements in section 1702 that apply to petitioners, and to assist the SWRCB in meeting its obligations under Water Code section 1702, the SWRCB's regulations, California Administrative Code, title 23, section

¹ Water Code section 85086, subdivision (c)(2), provides that any SWRCB order approving the California WaterFix petition "shall include appropriate Delta flow criteria." Water Code section 85086, subdivision (c)(1) provides that these criteria "shall include the volume, quality, and timing of water necessary for the Delta ecosystem under different conditions." Parts I and II of the SWRCB's hearing on the California WaterFix petition will need to address the issue of ensuring that the appropriate flow criteria contained in any SWRCB order on the petition are capable of being implemented without causing injury to other legal users of water and without causing any unreasonable effects on fish and wildlife.

794, subdivision (a), require each water rights change petition to provide various types of information, including the following:

(1) The amount(s) of water which would have been diverted, consumptively used, or stored under the water right in the absence of the proposed change(s), (a) during the period for which the change is requested, or (b) in a maximum year if the change is permanent;

(2) The amount(s) of water proposed for change, transfer or exchange;

* * *

(6) The existing and the proposed diversion, release and return flow schedules if stored water is involved or if the streamflow regime will be changed.

* * *

(9) Information identifying any effects of the proposed change(s) on other known users of water, including identification in quantitative terms of any projected change in water quantity, water quality, timing of diversion or use, consumptive use of the water, reduction in return flows, or reduction in the availability of water within the streams affected by the proposed change(s).

DWR's and Reclamation's Petition for the California WaterFix Project does not contain this required information. Instead, the Petition simply states that it is "limited in scope" and "proposes only to add points of diversion and rediversion" and not to change "any other aspect of existing SWP/CVP permits." (Petition Supp., at p. 1.)

The Petition goes on to state that "operations both now and in the future will not impact the quantity of water available for water users in the watershed because these demands are accounted for prior to diversions to storage or export." (Petition Supp., at p. 19.) The Petition, however, does not demonstrate that the proposed changes would not operate to the injury of any legal user of the water involved because: (i) the Petition does not describe any definite operation plan for the CVP and the SWP with the proposed new points of diversion, and (ii) the modeling conducted by DWR and Reclamation during the CEQA/NEPA process was flawed (see PCWA's July 28, 2014 comments on the DEIR/DEIS, PCWA's October 30, 2015 comments on the RDEIR/SDEIS, NSWA's July 28, 2014 comments on the DEIR/EIS, and NSWA's Oct. 30, 2015 comments on the RDEIR/SDEIS.) Moreover, the modeling conducted by DWR and Reclamation demonstrates that storage levels in Folsom Reservoir will be lower with the project, particularly in peak summer months, adversely impacting water supplies in the American River basin.

As discussed in the MBK Engineers technical memoranda that were included in PCWA's and NSWA's comments, the modeling that DWR and Reclamation conducted for the DEIR/EIS and RDEIR/SDEIS has the following flaws:

1. The incorporation of climate change into the model improperly relies on only one climate change projection when many climate change scenarios are possible, and improperly ignores reasonably foreseeable adaptation measures.
2. The model was built on a benchmark study that had numerous inaccuracies.
3. The model coding and data issues significantly skew the analysis and conflict with actual real-time operational objectives and constraints.
4. The “high outflow scenario” is not sufficiently defined for analysis.
5. Delta Cross-Channel operational assumptions overestimate October outflow.
6. San Luis Reservoir operational assumptions produce results inconsistent with real-world operations.

The Petition refers to the analysis of Alternative 4A in the California WaterFix RDEIR/SDEIS. (Petition Supp., at pp. 12, 13.) However, neither the Petition nor the RDEIR/SDEIS contains sufficient information regarding the details of how the CVP and SWP would be operated if the SWRCB were to grant the Petition, particularly with respect to the amounts of spring outflow and the quantity and timing of water diverted at the proposed new points of diversion and re-diversion. For example, the RDEIR/SDEIS and the Petition state that additional outflow may be required in order to meet the needs of threatened and endangered fish species (RDEIR/SDEIS at p. 4.1-13; Petition Supp., at p. 13), but neither the Petition nor the RDEIR/SDEIS describes the quantity, the timing or the source of water for this additional outflow. In addition, the Petition does not state when water would be diverted at each of the various existing and proposed points of diversion or what the quantities of diversions at each point of diversion would be. The Petition does not even state how DWR and Reclamation would make the decisions about where and when to divert water. As a result, neither interested parties nor the SWRCB can evaluate the potential effect of proposed Project operations.

Moreover, the modeling runs used for the environmental analysis in the RDEIR/SDEIS: (i) do not comport with the proposed flows in Alternative 4A, and (ii) overestimate Delta outflow and underestimate exports by several hundred thousand acre-feet per year. For example, the model calculates compliance with salinity water quality objectives mandated by State Water Resources Control Board Revised Decision 1641 (“RD-1641”) at Three Mile Slough. In contrast, Alternative 4A contemplates compliance with the same salinity requirement at Emmaton, which is located substantially downstream from Three Mile Slough. Compliance with this requirement at Three Mile Slough would require less outflow than would be required for compliance with the same requirement at Emmaton. Because the modeling analysis assumed compliance with this requirement would occur at Three Mile Slough while the proposed Alternative 4A now contemplates compliance with this requirement at Emmaton, the estimates of the outflows needed to meet salinity standards that were used in the modeling are too low.

Moreover, the flawed modeling that was used for the DEIR/S and not corrected for the RDEIR/SDEIS overestimated Delta outflows by about 200,000 acre-feet/year and underestimated exports to the CVP South of Delta and SWP contractors by about the same amount. That flawed modeling further underestimated diversions at the North Delta Diversion by about 500,000 acre-feet/year, thereby overestimating flows into the Delta and concluding that Project operations in the Delta would be much more benign than they actually would be.

Operations of the SWP and CVP using the proposed points of diversion and redirection must preserve water right priorities. (*El Dorado Irrigation Dist. v. State Water Resources Control Board* (2006) 142 Cal.App.4th 937, 966.) Petitioners must demonstrate how future operations of the CVP and SWP would avoid requiring upstream senior diverters and CVP and SWP contractors that would not be benefitted by the proposed changes to forego diversions so that the CVP and SWP can meet their operational requirements.

For example, in dry years such as those experienced in the last two years, DWR and Reclamation have not been able to meet the D-1641 flow and salinity requirements and have had to file several temporary urgency change petitions, which asked to SWRCB to reduce these requirements. Meeting existing flow and salinity requirement therefore could require additional flows in the interior Delta during future dry years. However, the proposed new diversion of water north of the Delta would reduce freshwater inflows into the Delta. To meet even existing standards while reducing Delta inflows, the CVP and SWP would need some new source of water, but no new source of water is described in the Petition.

The RDEIR/SDEIS states that such water would be obtained through water transfers, project reoperation or other sources. (RDEIR/SDEIS at p. 4.1-6.) However, this general statement does not meet the requirement that the petitioners demonstrate that the proposed California WaterFix Project would not injure other legal users of water. Petitioners must submit sufficient evidence and an adequate operational plan to establish that they would not operate facilities at the proposed points of diversion and re-diversion in a manner that would injure other legal users of water.

Finally, DWR and Reclamation must demonstrate that the future CVP and SWP operations with the proposed changes in points of diversion would not injure the ability of users within the area of origin to meet area of origin demands in the future. Protestants divert and use water within areas where water currently being exported originates. California law expressly recognizes the prior right of communities in these areas of origin to the water that is currently being exported, to the extent that water will be needed in the future to adequately supply the beneficial needs of those areas. (Water Code §§ 10505, 10505.5, 11460, 11463, and 11128; see also §§ 12200-12220.) Demand for water in counties of origin is expected to increase in the future and the likelihood that less water will be available for export is reasonably foreseeable.

Item 5 (specific information regarding Protestant's water rights)

Protestant claims a right to the use of water from the source from which petitioners are diverting, or propose to divert, which right is based on (identify type of right protestant claims, such as permit, license, pre-1914 appropriative right or riparian right):

PCWA holds pre-1914 appropriative water rights, and both post-1914 water right permits and licenses, as well as contracts for water from Reclamation and PG&E. PCWA's water rights and contracts as set forth in the Chart Entitled "Protestants Water Rights," below.

List permit or license or statement of diversion and use numbers, which cover your use of water (if adjudicated right, list decree):

See Chart Entitled "Protestants Water Rights," below.

Where is your diversion point located?

See Chart Entitled "Protestants Water Rights," below.

If new point of diversion is being requested, is your point of diversion downstream from petitioners' proposed point of diversion?

PCWA's points of diversion are located upstream of Petitioners' proposed points of diversion. However, project operations with the new points of diversion will adversely impact storage in Folsom Reservoir, which will affect PCWA's ability to divert water at Folsom Reservoir. Moreover, to the extent changes resulting from the Petition require additional flows downstream, or result in flow obligations on parties upstream of the points of diversion, PCWA could be injured by such change.

The extent of present and past use of water by protestant or its predecessors in interest is as follows:

The extent of present and past use by PCWA and its predecessors is set forth in water use reports filed with the SWRCB Division of Water Rights. PCWA's present and past use is summarized below.

PCWA constructed the MFP (Federal Energy Regulatory Commission [FERC] Project No. 2079), a multi-purpose water supply and hydro-generation project, in order to, among other things, provide a secure source of water for the citizens of Placer County. The MFP seasonally stores and releases water under water rights permits 13856 and 13858 to meet consumptive water demands within western Placer County and northern Sacramento County while simultaneously generating power for the California electric grid. Currently, water for consumptive purposes is released from the MFP and subsequently rediverted at two locations:

(1) the American River Pump Station near Auburn, CA; and (2) Folsom Reservoir.

PCWA also has a water service agreement with Reclamation (1970 Water Service Agreement and subsequent amendments) for a supply of Central Valley Project (CVP) water (35,000 ac-ft) from the American River Division. This contract water is available for diversion at Folsom Reservoir.

Finally, PCWA has a water service agreement with Pacific Gas and Electric Company for 125,000 ac-ft of water that originates in the Yuba and Bear River systems and is available for diversion throughout Placer utilizing a series of water conveyances that date to the California Gold Rush.

Each of these supplies can serve the Agency's "Western Water System" Service Area, which generally provides treated and untreated water to the communities of Auburn, Bowman, Ophir, Newcastle, Penryn, Loomis, Rocklin, Lincoln, the Dry Creek Community Plan area west of Roseville, and portions of Granite Bay. PCWA also serves commercial agricultural customers generally located west of the City of Lincoln.

Each of these supplies can also be put to beneficial use in additional areas in western Placer County and northern Sacramento County served by PCWA's wholesale customers. These additional areas include the City of Roseville, San Juan Water District (SJWD), and Sacramento Suburban Water District (SSWD).

Finally, PCWA uses its Middle Fork Project supplies to provide water for environmental purposes in the lower American River as part of its Sacramento Water Forum Agreement commitment, by releasing water to Folsom Reservoir where it is managed and re-released by Reclamation pursuant to Warren Act contracts to downstream consumptive users in dry years while simultaneously providing benefits to the ecosystem.

Protestants Water Rights

Application Number	Permit ID	License ID	Water Right Type	Status	County	Point(s) of Diversion (HUC 12)
A018084	13855		Appropriative	Permitted	Placer	Brushy Creek-Middle Fork American River, Deer Creek-Rubicon River, Dolly Creek-Middle Fork American River, Duncan Creek, Long Canyon, Volcano Canyon-Middle Fork American River
A018085	13856		Appropriative	Permitted	Placer, Sacramento	Deer Creek-Rubicon River, Dolly Creek-Middle Fork American River, Duncan Creek, Folsom Reservoir-North Fork American River, Upper American River
A018086	13857		Appropriative	Permitted	Placer	Deer Creek-Rubicon River, Dolly Creek-Middle Fork American River, Duncan Creek, Long Canyon, Volcano Canyon-Middle Fork American River
A018087	13858		Appropriative	Permitted	Placer, Sacramento	Deer Creek-Rubicon River, Dolly Creek-Middle Fork American River, Folsom Reservoir-North Fork American River, Long Canyon, Upper American River
A026637	18380	12644	Appropriative	Licensed	Placer, Sacramento	Deer Creek-Rubicon River
A029721	20754		Appropriative	Permitted	Placer	Hell Hole Reservoir-Rubicon River
S000959			SOD&U (Pre-1914)	Claimed	Placer	Indian Creek-North Fork American River
S000967			SOD&U (Pre-1914)	Claimed	Placer	Dutch Ravine-Auburn Ravine
S010397			SOD&U (Pre-1914)	Claimed	Placer	Orr Creek
S010398			SOD&U (Pre-1914)	Claimed	Placer	Orr Creek

Protestants Water Supply Contracts

Provider	Contract ID No.	Date Executed	Basis of Supply	Amount (AF)	County	Point(s) of Diversion (HUC 12)
U.S. Bureau of Reclamation	14-06-200-5082A	September 18, 1970 (as amended)	Central Valley Project	35,000	Nevada, Placer, El Dorado	The U.S. Bureau of Reclamation's Points of Diversion for Water Rights associated with the Central Valley Project, as filed with the Division of Water Rights.
Pacific Gas & Electric Co.	NA	February 19, 2015	Drum Spaulding Project (FERC No. 2310)	125,400	Nevada, Placer, El Dorado	Canyon Creek, Fordyce Creek, Fall Creek-South Yuba River, Woods Creek-Yuba River, Rattlesnake Creek-South Yuba River, North Fork of North Fork American River, Indian Creek-North Fork American River, Orr Creek, Magnolia Creek-Bear River, Steephollow Creek, Little Bear Creek-Bear River

Attachment 6
PROOF OF SERVICE

I am employed in the County of Sacramento; my business address is 500 Capitol Mall, Suite 1000, Sacramento, California; I am over the age of 18 years and not a party to the foregoing action.

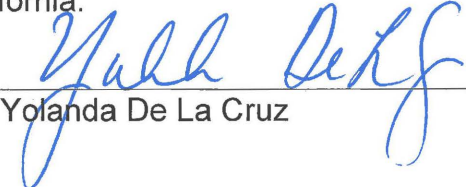
On January 4, 2016, I served a true and correct copy of the PROTEST – PETITION (By Placer County Water Agency) – PETITION (of Department of Water Resources and Bureau of Reclamation, California Water Fix Project:

XXX (electronically) by electronically transmitting a true copy to the person(s) at the electronic mailing addresses as set forth below.

California Department of Water Resources
c/o James Mizell
1416 Ninth Street, Room 1104
Sacramento, CA 95818
James.Mizell@water.ca.gov

U.S. Bureau of Reclamation
c/o Amy Aufdemberge
U.S. Department of Interior
Office of Regional Solicitor, Pacific Southwest
Region
2800 Cottage Way Sacramento, CA 95825-1898
Amy.Aufdemberge@sol.doi.gov

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 4, 2016, at Sacramento, California.



Yolanda De La Cruz