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VIA EMAIL  
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May 19, 2014

State Water Resources Control Board  
Clerk to the Board  
Post Office Box 100  
Sacramento, CA 95812-0100

**SUBJECT:** 5/20-21/14 BOARD MEETING Agenda Item #13  
Options for Drought Related Curtailments of Post-1914 Water Rights in the  
Sacramento-San Joaquin River Delta

These comments are provided on behalf of Banta-Carbona Irrigation District, Patterson Irrigation District, The West Side Irrigation District and West Stanislaus Irrigation District, to the Options for Drought Related Curtailments of Post-1914 Water Rights in the Sacramento-San Joaquin River Delta.

The districts are very concerned with the goals of the State Water Board staff in these proceedings. While we recognize the severity of the ongoing drought, we are concerned that staff is viewing the drought as justification for achieving wholesale water reallocations: from senior water right holders to junior water right holders, and from water right holders to the environment. The law establishes a method for allocating water right in times of shortage. The law also establishes a method for reallocating water right to the environment when needed, and to the extent needed. The State Water Board must insure that any action to impose drought related curtailments complies with the law – the Governor’s April 25, 2014 Emergency Drought Proclamation requires as much, providing:

The Water Board will adopt and implement emergency regulations pursuant to Water Code section 1058.5, as it deemed necessary to prevent the waste, unreasonable use, unreasonable method of use, or unreasonable method of diversion of water, to promote water recycling or water conservation, and to require curtailment of diversions when water is not available under the diverter’s priority of right.

Courts have made very clear:

Every effort, however, must be made to respect and enforce the rule of priority. A solution to a dispute over water rights must preserve water right priorities to the

extent those priorities do not lead to unreasonable use. *El Dorado Irrigation District v. State Water Resources Control Board* (2006) 142 Cal. App. 4th 937, 966.

The Court in *El Dorado* explained that the role of the State Water Board “was not simply to determine which choice it thought was the most ‘fair,’ untethered from any guiding principles. On the contrary, in making that choice the Board’s ‘first concern’ should have been to recognize and protect . . . prior appropriative right[s], if possible”. *Id.* at pp. 970 - 971.

## **SAN JOAQUIN RIVER**

It is our understanding that there is currently a serious problem with releases being made by the CVP and SWP in the Sacramento River system to meet the Bay-Delta Water Quality Control Plan. These Sacramento River system releases from project storage reservoirs are being diverted before they reach their destination in the Delta. We certainly understand that such an issue must be addressed. However, there is no similar problem in the San Joaquin River system. Releases being made from New Melones Reservoir on the Stanislaus River are reaching their compliance point in the San Joaquin River at Vernalis; releases being made from reservoirs on the Merced and Tuolumne Rivers are likewise meeting their compliance points on their respective rivers. There have been no complaints from senior right holders on the San Joaquin River system.

Diverters in the San Joaquin River system have been coordinating efforts in this historically dry year in an attempt to work cooperatively to maximize beneficial use of water in the system. As stated in the attached letter, signed by the senior water right holders on the San Joaquin River system:

The Signatories understand that there is not sufficient inflow this year to satisfy the demands of all water right holders. In response to this shortage, many of the Signatories have revised operations and implemented drought shortage measures. The Signatories also have a solid understanding of the priority of water rights, the projected inflow for the remainder of the water year, and the estimated depletions (both natural and diversions). The Signatories drought operations plans are based on this information and none of the Signatories intend to file complaints or otherwise claim injury pursuant to these operations. In other words, the Signatories have developed operations plans that do not require and would not benefit from the State Water Board taking curtailment action.

The senior water right holders do not believe they would benefit from State Water Board action. We would request that the State Water Board exclude the San Joaquin River system from its options for drought related curtailments.

## **GENERAL BACKGROUND**

The Staff Report statements and proposals regarding curtailment options ignore California law; therefore, we will outline key points of law so as to better understand the shortcoming of the staffs’ options.

### Water Right Priority

The California Supreme Court has recently confirmed that water right priorities are the “central principle in California water law.” *City of Barstow v. Mojave Water Agency* (2000) 23 Cal.4th 1224, 1243. The State Water Board cannot assign responsibility for meeting water quality objectives in a manner that undermines water right priorities without substantial justification for doing so. *El Dorado Irrigation District v. State Water Resources Control Board* (2006) 142 Cal.App. 4th 937.

### Due Process of Law

Once rights to use water are acquired, they become vested property rights. As such, they cannot be infringed by others or taken by governmental action without due process and just compensation. *United States v. State Water Resources Control Board* (1986) 182 Cal. App. 3d 82, 101. In taking action to curtail water rights as stated in the staff report, the State Water Board is performing an adjudicatory function (Id. at p. 113), and findings are required in order to bridge the analytical gap between the raw evidence and ultimate decision. Id.

### Physical Solutions

California courts have also emphasized that physical solutions must be considered as a practical way to meet the requirements of Article X, Section 2 of the California constitution before adversely affecting a vested water right. *City of Barstow*, Id. at p. 1250; *City of Lodi v. East Bay Mun. Utility Dist.* (1936) 7 Cal.2d 316, 341. Physical solutions have been promoted by courts, allowing curtailment of water rights to be imposed only where “no other relief is adequate.” *Montecito Valley Water Co. v. Santa Barbara* (1904) 144 Cal. 578, 592. The Supreme Court has gone so far as to impose an obligation upon courts to evaluate available physical solutions. *City of Lodi*, Id. at p. 341.

### Public Trust

While the California Supreme Court emphasized that appropriative water rights are always subject to a duty of continuing supervision and imposition of public trust considerations, it has clarified that public trust uses have no priority over other water uses, and all competing uses of water must be balanced. *National Audubon Society v. Superior Court* (1983) 33 Cal.3d 419, 445-47. Balancing is an essential component of public trust determinations; in fact the Board must consider whether the protection of public trust values is consistent with the “public interest,” considering all of the beneficial uses to be made of water, including consumptive uses. *State Water Resources Control Board Cases CO44714* (2006) 136 Cal.App.4th 674. As the State Water Board has recognized: “Due to factual differences regarding public trust resources and competing uses of water in different situations, the effect of the public trust doctrine differs in each situation in which it is applied.” *In the Matter of Fishery Resources and Water Right Issues of the Lower Yuba River* (2001) D-1644 at p. 33.

We do not dispute that sometimes the use of water under a claim of prior right must yield to the need to preserve water quality to protect public trust interests, and continued use under those circumstances may be deemed unreasonable. . . . At the same time, however, when the Board seeks to ensure that water quality objectives are met in order to enforce the rule against unreasonable use and the public trust doctrine, the Board must attempt to preserve water right priorities to the extent those priorities do not lead to unreasonable use or violation of public trust values. In

other words, in such circumstances the subversion of a water right priority is justified only if enforcing that priority will in fact lead to the unreasonable use of water or result in harm to values protected by the public trust. *El Dorado Irrigation District v. State Water Resources Control Board* (2006) 142 Cal. App. 4th 937, 967.

## **SPECIFIC COMMENTS ON STAFF REPORT**

### Discussion

- Staff makes the statement that “natural flows in the Delta Watershed are inadequate to support all diversions and instream beneficial uses.”

Water right holders and State Water Board staff need more and better information on flows in the Delta Watershed. Staff has been using "Full Natural Flow" to determine water availability; this represents the natural water production of a river basin, unaltered by upstream diversions, storage, or by export or import of water to or from other watersheds. While this estimates the quantity of water that may be available for riparians, it ignores substantial sources of water and ignores the actual condition of the river at any given time. In the San Joaquin River, the majority of water in the river during the irrigation season is not natural flow – it is comprised of groundwater accretions, irrigation runoff, discharged treated wastewater, abandoned stored water, and other sources. Water from these sources is available for diversion by appropriators and cannot be ignored.

In fact, a group of senior water right holders on the San Joaquin River is in the process of compiling information on flows on the river during the irrigation season – a time when natural flow in a drought year would cease in June - on the San Joaquin River tributaries. The raw data we have received to date indicates that much of the San Joaquin River from the Merced River to Vernalis is gaining flow as a result of groundwater accretions, irrigation runoff, discharged treated wastewater, abandoned stored water, and other sources, even in the driest years like 2013. We have attached four figures that show San Joaquin River flows from January 2012 through April 2014. These four figures clearly demonstrate that the San Joaquin River is a gaining river even with full diversions by riparian, pre-1914 and post-1914 water rights holders. In particular, in the reach between the Patterson and Maze gages (Figure 4), there are substantial diversions (in excess of 575 cfs) but because of the inflows from groundwater accretions, irrigation return flows, abandoned stored water and other sources there is sufficient flow to fully support the diversions.

- The Staff Report does not articulate clearly the goals to be achieved by the proposed curtailment options. In the first paragraph, it is stated that:

Curtailments are necessary so that previously stored water is not illegally diverted and water is available for: (1) senior water right users; (2) minimal public trust water uses, such as fish and wildlife protection; and (3) minimum health and safety and other critical water uses.

Again, staff has not provided sufficient information. Senior water right holders in the San Joaquin River watershed have confirmed to the State Water Board that curtailments are not necessary. The State Water Board has not determined the quantity of water that would be needed in the San Joaquin River basin for public trust purposes. One can only assume that the objectives established in the Bay-Delta Water Quality Control Plan would be sufficient to meet public trust uses, and those objectives are continuously being met in the San Joaquin River watershed, except for instances in

which the State Water Board itself has determined that the objectives should not be met<sup>1</sup>.

### Background

- Staff indicates that “without providing that salinity control, water from the ocean would intrude into the Delta, and salinity conditions for diversion from the Delta would not be adequate for agricultural or municipal and industrial uses in dry years like this one.”

Staff has not evaluated the conditions of the Delta under full natural flow. While senior water right holders may be called upon, *after due process*, to meet public trust and water quality objectives, they cannot be called upon to improve the conditions in the Delta beyond that which would have occurred under natural conditions.

- Staff notes that the Drought Operations Plan “lays out proposed operations with and without temporary rock barriers in the Delta, to reduce the need for upstream releases to repel salinity.” However, it further notes that DWR announced on April 18, 2014 that the temporary rock barriers “would not be needed this summer.”

As mentioned above, physical solutions must be considered as a practical way to meet the requirements of Article X, Section 2 of the California constitution before adversely affecting a vested water right. As such, before senior water right holders can legally be curtailed, DWR should be required to install the temporary rock barrier as a physical solution.

- For the Delta, the projection is that water will not be available as early as May 15 for all post-1914 water right holders, as soon as June 1 for all junior pre-1914 water right holders, and after June 16 for additional pre-1914 water rights, with any remaining supply to be shared on a correlative basis among riparian users.

Staff makes sweeping statements without detail – which is critically important in order to follow the water right priority system imposed by law. Who has a right to divert water in the river depends upon (1) the type of water right held by the diverter, and (2) the type of water in the river.

**Riparians** have a right to take the natural flow of the river, i.e., water that would be found in the river naturally. In the San Joaquin River system, such water is generally unavailable in very dry years after June 1.

**Appropriators** have a right to take water in the river available for appropriation. This includes natural flow, imported water, stored water that has been abandoned, return flow, accretions, wastewater discharges, etc.

On the San Joaquin River system, it is also important to determine when stored water released from reservoirs on the tributaries is available for appropriation. Fishery flows released from storage on the Merced and Tuolumne Rivers are released to meet a compliance point downstream on the tributary, before the confluence with the San Joaquin River. Merced Irrigation District’s point of

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<sup>1</sup> The State Water Board determined in its April 11, 2014 modification to the TUCP to provide relief for Reclamation from the Vernalis fishery flow objectives for June, instead allowing Reclamation to operate to the applicable NMFS Biological Opinion flows, dissolved oxygen requirements on the Stanislaus River at Ripon and D-1641 salinity requirements at Vernalis on the San Joaquin River.

compliance for all state and federal flow requirements is at Shaffer Bridge on the Merced River. The point of compliance for all state and federal flow requirements imposed upon Modesto and Turlock Irrigation Districts is at La Grange Bridge on the Tuolumne River. Fishery and water quality flow released from storage on the Stanislaus River is released to meet a compliance point in the San Joaquin River, downstream at Vernalis. As the State Water Board has recognized, these types of releases:

. . . are like return flow from irrigation; after the water has been put to the beneficial use for which it was appropriated, it is abandoned. If water has been abandoned, it can be appropriated again. WR 95-14 at pp. 23-24.

Thus, if the USBR releases water from New Melones Reservoir for the beneficial use of fish and wildlife preservation and enhancement, and this use is satisfied, the water remaining in the river becomes abandoned water that the USBR could appropriate along with unappropriated water from other sources. *Id.* at p. 24.

The USBR releases water from New Melones Reservoir pursuant to its obligations under the federal Endangered Species Act to ensure that there are adequate flows for fish protection at Vernalis, but the released water is abandoned when it reaches Vernalis. The SWRCB recognizes that the same water may again be appropriated in the Delta by water right holders. . . . WR Order 98-09 at pp. 20-21.

Staff must evaluate all water available for appropriation in the San Joaquin River system before curtailment notices are issued, and must also recognize who has a right to divert that water, with curtailment notices being directed to riparians or junior appropriators, as appropriate.

- The Staff states that while water will not be available for certain diverters under their priority of right, DWR and Reclamation will continue to make storage releases to meet Delta outflow and other requirements. If diverters continue to divert after water is no longer available under their priority of right, they will effectively be diverting previously stored water to which they do not have a right unless they have a contract with Reclamation or DWR.

This statement invokes the curtailment restriction imposed by Term 91. Term 91 is intended to insure that when the CVP and SWP must release water to meet water quality objectives in the Delta junior appropriators are not diverting the water. During such conditions, all of the natural and abandoned flows in the watershed are committed to meeting the objectives, and the projects only divert for export purposes water released from upstream storage at project facilities. However, Term 91 applies only to post-1965 appropriators; it cannot be used to impose curtailments upon pre-1914 appropriators or pre-1965 post-1914 water right holders.

The Delta Watermaster and the State Water Board staff have recommended expanding Term 91 to (1) prevent downstream water right holders from diverting stored water and (2) spreading the obligation to meet water quality objectives upon more water users. In order to do so, the State Water Board must comply with the requirements of due process; it cannot do so by emergency regulation or system-wide curtailment. As detailed in the *El Dorado* decision, senior water right holders are:

under no obligation (absent some action by the Board) to bypass natural flow that is needed to meet Delta water quality objectives. Thus, there may be times when the

natural flow is sufficient to allow [them] to divert *and* to meet the needs of downstream riparians and senior appropriators, but not sufficient to also satisfy Delta water quality objectives. In those circumstances, [their] diversion of the natural flow available under the rule of priority will require the projects to release more stored water to satisfy the water quality objectives. Even in those circumstances, however, [senior water right holders] cannot be deemed to have taken the projects' stored water. What [they are ] taking is natural flow to which it has a right under the rule of priority, while the projects are required to release stored water to meet Delta water quality objectives under the compulsion of prior Board decisions. Thus, the rule against the taking of water stored by others is not implicated here, and the Board's interest in protecting the projects' stored water for export does not trump the rule of priority. *El Dorado Irrigation District v. State Water Resources Control Board*, Id. at p. 969.

- This is the case even in stream systems or reaches of streams where Reclamation and DWR are not making releases because their need to make releases is increased by diversions elsewhere in the watershed where hydrologic continuity with the Delta exists.

In the San Joaquin River watershed we must look carefully to determine whether or not this statement is true. As discussed above, the hydrologic information has indicated that much of the San Joaquin River from the Merced River to Vernalis is gaining flow as a result of groundwater accretions, irrigation runoff, discharged treated wastewater, abandoned stored water, and other sources, even in the driest years like 2013. This real time data clearly demonstrates that the San Joaquin River is a gaining stream and each particular reach of the river must be examined to determine if water is available for appropriation.

## **ISSUES FOR DISCUSSION AT THE WORKSHOP**

Staff has set forth specific questions for discussion at the workshop.

### **1. Which curtailment option would be the most effective and enforceable?**

The first question should not be which curtailment option would be "the most effective and enforceable," rather, it should be which curtailment option would be legal?

#### **Option 1 – Existing Authorities**

Option 1 is the only curtailment option set forth in the staff report that complies with the law. Option 1 follows the water right priority system. Option 1 also would follow due process procedures, and require investigation and a hearing before liability could be imposed. However, implementing Option 1 still requires that the State Water Board use real time information, consisting of actual water flows and actual diversions.

In order to impose curtailments in accordance with water right priorities, the State Water Board must take different action depending upon the river conditions. For early spring flows, the State Water Board must identify junior water right holder and hold water right hearings to curtail junior water rights in sufficient quantity as needed for the identified need. For late spring and summer flow requirements, the State Water Board must take an additional step to address riparian diversions. The State Water Board must estimate the amount of natural flow in the system and

ensure riparians are not diverting stored water.

### **Option 2 – Emergency Regulations**

The State Water Board does not have the authority to adopt the emergency regulation that it describes. As stated recently by the Mendocino County Superior Court, prior California cases have determined:

. . .blanket rules or broad regulations, whether they be prohibitions, or limitations on right to use water, do not withstand constitutional challenge when such rules broadly and uniformly affect groups of vested rights holders – in particularly riparians, overlyers and pre-1914 appropriative right holders – absent specific and particularized findings as to how those individual rights are exercised or their access to water put to a reasonable and beneficial use is affected. *Light v. State Water Resources Control Board* (2012) Mendocino County Superior Court, Order granting petition for Writ of Mandate in Consolidated Actions, Case No. SCUk CVG 11 59127, at p. 24.

Similar to the frost protection rule adopted by the State Water Board in Section 862 of Title 23 of California Code of Regulations, here the court is making a broad and unsupported finding that every water user in the watershed presents a risk to fish and wildlife and water quality objectives which in turn is an unreasonable method of use of water. The State Water Board's determination to adopt an emergency regulation to curtail water diversions here mirrors their prior action in Mendocino County: "The crux of the problem is that there were no findings as to the particular water right holders. At the administrative level there were no findings about the specific individual use or method of use by the [water] rights holders and to what extent that particular use poses a risk to the salmonid population." *Id.* at p. 25.

The rule of reasonable use in Article X Section 2 of the California constitution not only limits the rights of water users, it also protects their actual reasonable beneficial uses. "Their individual rights cannot be adequately protected when their individual uses were never examined". *Id.* at p. 27, citing *Tulare* 524-25.

### **Option 3**

As mentioned above, the State Water Board does not have the authority to adopt the type of emergency regulations that it describes. In addition, the board does not have the authority to impose Term-91 type conditions upon senior water right holders for the reasons discussed above.

### **Option 4**

Option 4 is not detailed enough to provide comments. However, for the reasons mentioned above, the State Water Board does not have the authority to impose Term-91 type conditions upon senior water right holders.

## **2. Are there any other curtailment options that should be considered?**

An option for the San Joaquin River system is to be excluded from any curtailment.



**3. How can human health and safety needs be addressed under the various approaches to curtailments?**

For the San Joaquin River main stem, there are no diversions for the purpose of health and human safety/public drinking water uses on the river. While municipal and industrial is designated as a beneficial use for the San Joaquin River, the California Department of Health prohibits such use. Vernalis flows contribute very little to flows in the Delta and do not contribute to net Delta outflow. The Drought Operations Plan submitted as part of the TUCP process demonstrates that the 1,500 cfs public health and safety pumping will be met by the operation contained in that plan. As such, curtailment on the San Joaquin River system will not benefit human health and safety needs.

**4. How can the State Water Board ensure that Delta needs will be met? The needs of fish and wildlife? The needs to maintain adequate end of month storage levels?**

This question is difficult to answer if there is no explanation as to what "Delta needs" are referenced, as there are various Delta needs.

- Exports – to the extent the State Water Board is attempting to ensure that the needs of state and federal project exports are met, it violates the rule of priority. The State Water Board has already relaxed water quality conditions imposed upon the conditions of the state and federal export projects. To the extent that it now intends to impose upon senior water right holders the obligations to meet those same water quality objectives, the rule of priority prohibits such action.
- Salinity Control – to the extent the State Water Board is attempting to ensure that ocean water does not intrude into the Delta it must evaluate what the conditions in the Delta would be under natural conditions. Senior water right holders cannot be forced to forego diversions in order to create an artificial condition that would not have existed without their diversions under natural conditions. In addition, the State Water Board must introduce evidence that but-for the diversions it intends to curtail, the situation would not exist.
- Fish and Wildlife - to the extent the State Water Board is attempting to improve fish and wildlife conditions in the Delta it must evaluate what the conditions in the Delta would be under natural conditions. Again, senior water right holders cannot be forced to forego diversions in order to create an artificial condition that would not have existed without their diversions under natural conditions.

**5. How can voluntary water-sharing agreements be accommodated? What criteria should be used to determine whether voluntary agreements are viable alternatives to mandatory curtailments?**

The request of the senior water right holders in the San Joaquin River watershed should be accommodated. Such voluntary agreements should be approved as a viable alternative where no senior water rights would be impaired, and there is no unreasonable impact upon fish, wildlife or other delta water quality conditions.

Those criteria are met on the San Joaquin River. The State Water Board has a letter signed by all senior water right holders in the basin documenting their support for no curtailment.

The State Water Board has not determined the quantity of water that would be needed in the San Joaquin River basin for public trust purposes. One can only assume that the objectives established in the Bay Delta Water Quality Control Plan would be sufficient to meet public trust uses, and those objectives are continuously being met in the San Joaquin River watershed, except for instances in which the State Water Board itself has determined that the objectives should not be met<sup>2</sup>.

**6. Which curtailment option would be the most responsive to changing conditions?**

Option 1 would be the most responsive to changing conditions. Curtailments notices can be issued or withdrawn very quickly in response to changing conditions, and information can be obtained electronically.

**CONCLUSION**

We urge the State Water Board to adopt Option 1 and base any curtailment notices on real time river information. Further, we respectfully request that the San Joaquin River system be excluded from any curtailment notices in accordance with the agreement submitted by all the senior water rights holders in the San Joaquin River system.

We appreciate the opportunity to comment on this very important issue.

Very truly yours,



JEANNE M. ZOLEZZI  
Attorney-at-Law

JMZ:pg

Enclosures

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<sup>2</sup> See Footnote 1 regarding TUPC decision.

May 2, 2014

Caren Trgovcich, Deputy Director of Water Rights  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

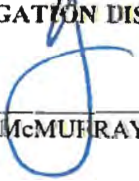

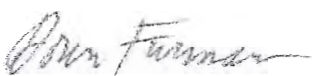
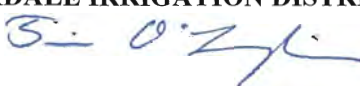
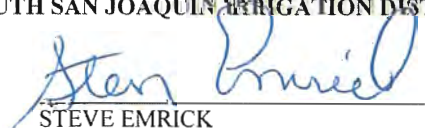
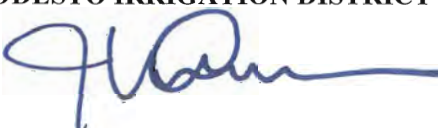
Dear Ms. Trgovcich:

The signatories to this letter (Signatories) would like to thank the State Water Resources Control Board (State Water Board) staff for the engagement on potential curtailment action in response to the drought and this year's significantly reduced precipitation and runoff. The Signatories understand the State Water Board staff is considering curtailment action in order to protect senior water right holders from the diversion of water by junior water right holders in a time of shortage. As the major senior water right holders on the San Joaquin River system, the Signatories request the State Water Board withhold taking any curtailment action until it receives a complaint from a valid senior water right holder.

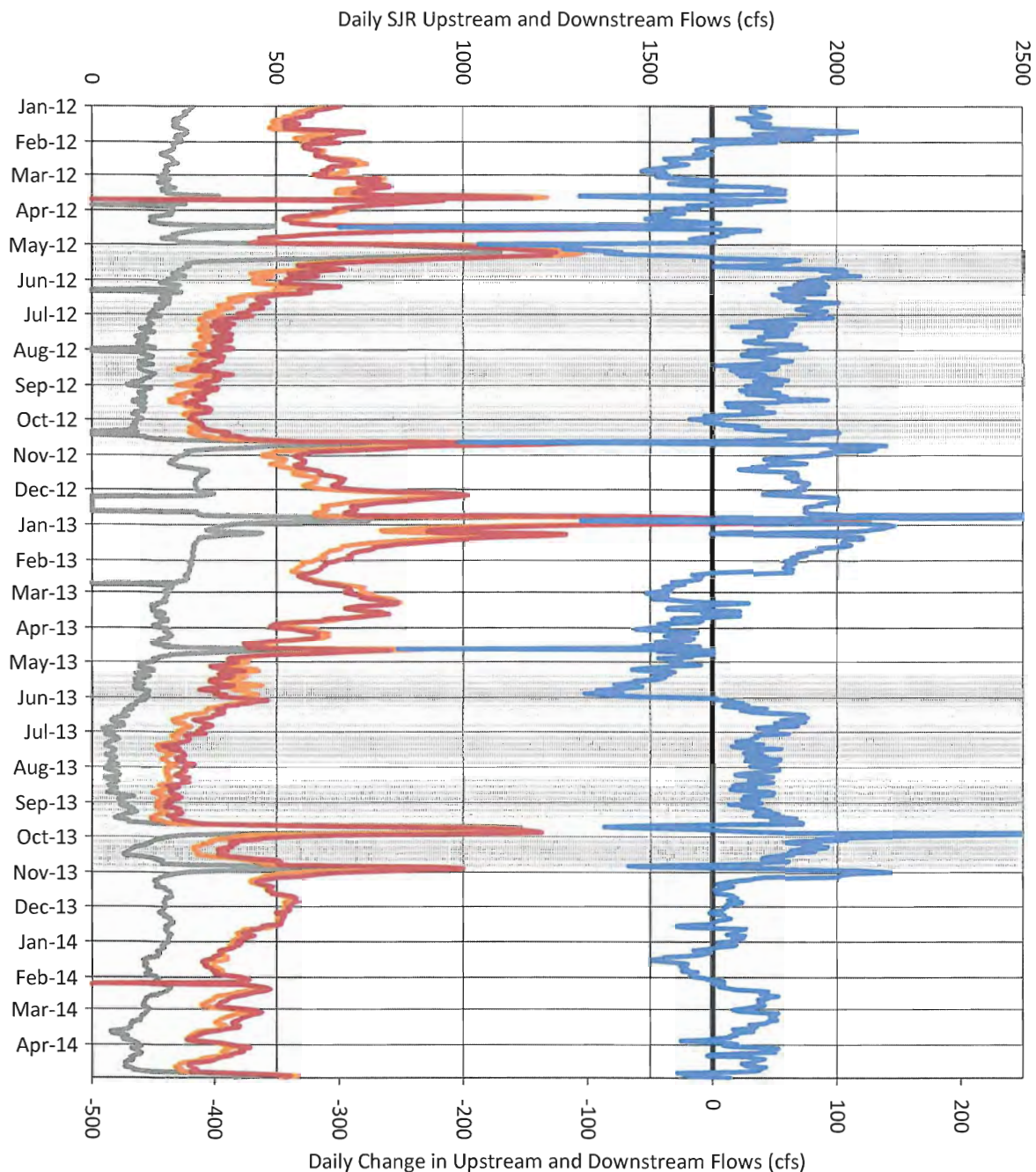
The Signatories understand there is not sufficient inflow this year to satisfy the demands of all water right holders. In response to this shortage, many of the Signatories have revised operations and implemented drought shortage measures. The Signatories also understand the priority of water rights, the projected inflow for the remainder of the water year, and the estimated depletions (both natural and diversions) in the system. The Signatories' drought operations plans are based upon this information and none of the Signatories intend to file complaints or otherwise claim injury pursuant to these operations. In other words, the Signatories have developed operations plans that do not require and would not benefit from the State Water Board taking curtailment action.

Through this letter, the Signatories do not intend to waive any water right or priority of right. To the extent that inflow or depletions are different from those projected, the Signatories reserve their respective rights to protect their water rights and enforce the rules of water right priority. However, the Signatories do not anticipate the need for action and respectfully request the State Water Board withhold any curtailment action until a valid senior water right holder complains of injury from junior diversions.

Very truly yours,

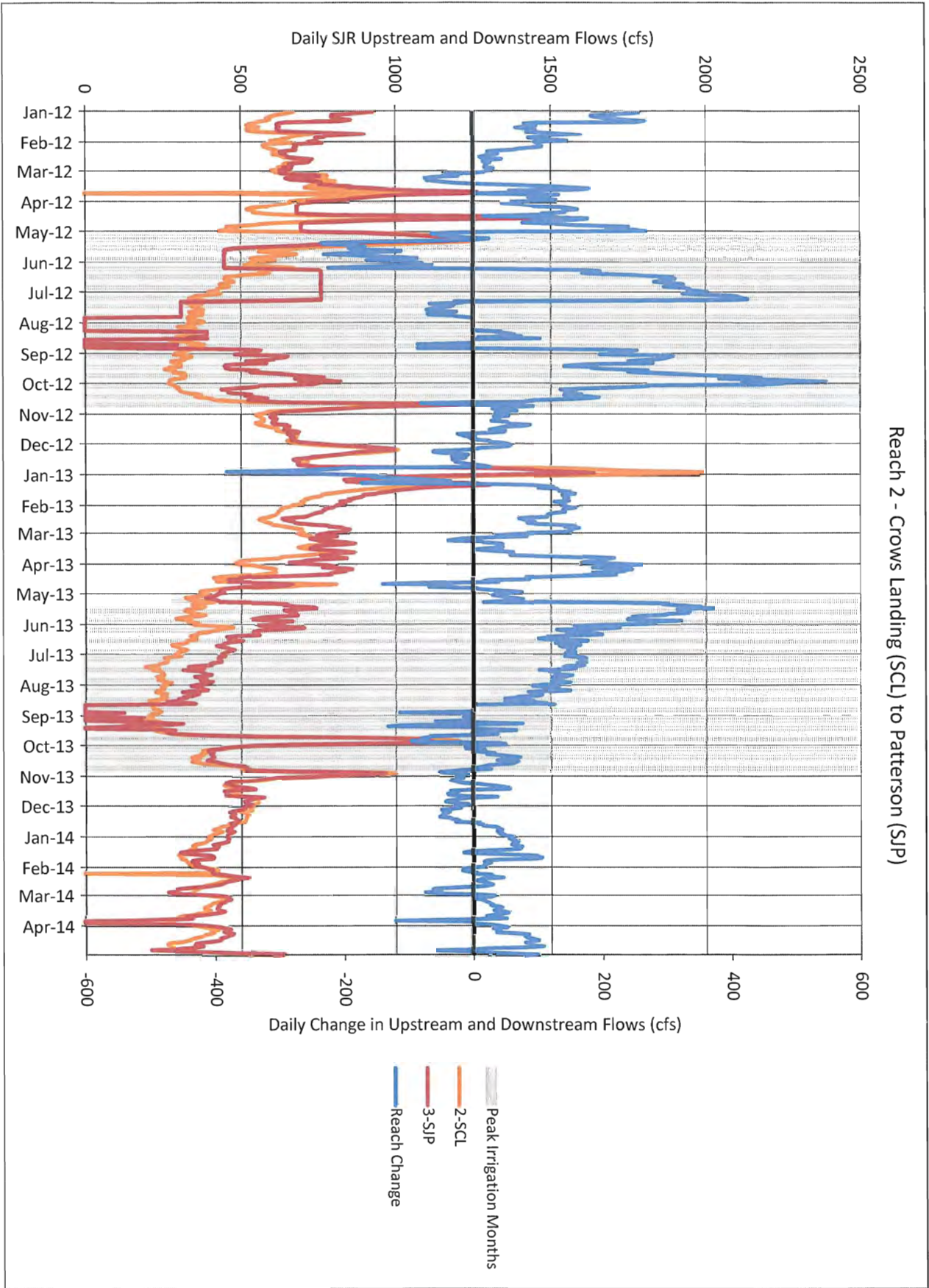
<b>MERCED IRRIGATION DISTRICT</b>  By:  PHILLIP McMURRAY	<b>TURLOCK IRRIGATION DISTRICT</b>  By:  ART GODWIN
<b>CITY AND COUNTY OF SAN FRANCISCO</b>  By:  DONN FURMAN	<b>OAKDALE IRRIGATION DISTRICT</b>  By:  TIM O'LAUGHLIN
<b>SOUTH SAN JOAQUIN IRRIGATION DISTRICT</b>  By:  STEVE EMRICK	<b>MODESTO IRRIGATION DISTRICT</b>  By:  JOY WARREN

<p><b>SOUTH DELTA WATER AGENCY</b></p> <p>By: <u>Dean Ruiz</u> DEAN RUIZ</p>	<p><b>PATTERSON IRRIGATION DISTRICT</b></p> <p>By: <u>Karna Harrigfeld</u> KARNA HARRIGFELD</p>
<p><b>BANTA-CARBON IRRIGATION DISTRICT</b></p> <p>By: <u>Karna Harrigfeld</u> KARNA HARRIGFELD</p>	<p><b>SAN JOAQUIN RIVER EXCHANGE CONTRACTORS WATER AUTHORITY</b></p> <p>By: <u>Paul Minasian</u> PAUL MINASIAN</p>

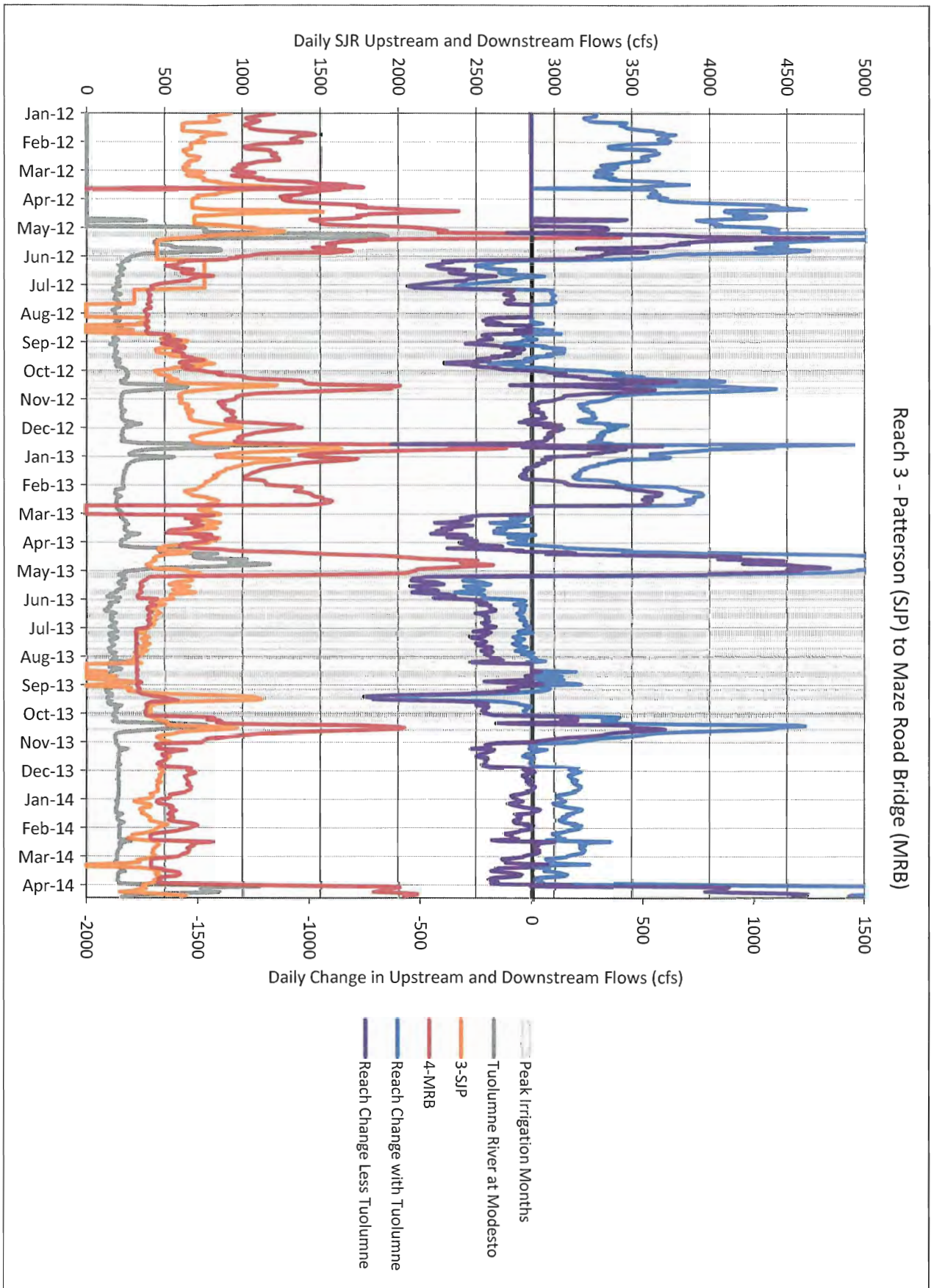


Reach 1 - Newman (NEW) to Crows Landing (SCL)

- Peak Irrigation Months
- Merced River at Stevenson
- SJR At NEW
- SJR at SCL
- Reach Change



Reach 3 - Patterson (SJP) to Maze Road Bridge (MRB)



Reach 4 - Maze Road Bridge (MRB) to Vernalis (VNS)

