



PLACER COUNTY WATER AGENCY
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June 25, 2015

Tom Howard, Executive Director
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Sacramento River Temperature Plan and Project Operations

Dear Mr. Howard:

The Placer County Water Agency (PCWA) understands and appreciates the very difficult situation presented by the unprecedented drought plaguing California and the careful consideration required when making difficult water management decisions. In this regard, PCWA supports the efforts of water users throughout the state that developed the Sacramento River Temperature Management Plan (Plan), which attempted to strike a balance between environmental demands and the need to supply water for municipal, industrial and agricultural uses throughout the state. PCWA supports the objectives of the Plan.

While we support the objectives of the Plan, we object to the recent modifications to the Plan that put extraordinary strain on Folsom Reservoir, threatening to draw down Folsom Reservoir to an end of September storage level of 120,000 acre-feet. Targeting such a dangerously low level of storage so early in the fall puts the people and economy of the Placer/Sacramento region in unnecessary peril of collapse from region-wide water shortages. The current iteration of the plan and resulting operations also guarantees the complete loss of resident Steelhead due to high temperatures in the Lower American River. It also jeopardizes this year's fall Salmon run due to high temperatures and low flows in the Lower American River.

We have been monitoring activities before the State Water Resources Control Board (SWRCB), including information provided to the SWRCB pursuant to the SWRCB's informational order, the SWRCB's agreement to forego curtailments and enforcement against certain diverters who claim riparian water rights, and have reviewed the June 16, 2015 complaint submitted by the State Water Contractors. Taken together, there appear to be serious and significant questions regarding claimed rights to water in the Delta, significant questions regarding the source of water diverted under those claimed rights, and questions regarding whether any natural flow would be available for the continued diversion under claimed riparian rights throughout the summer months. As natural flow is depleted, demands, including those created by the SWRCB's agreement with certain claimed riparian water right holders, will need to be met

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through project releases, including releases from Folsom Reservoir, putting an even greater demand on an already taxed system.

In order to protect water supplies and rights to water throughout the system, we support efforts to conduct an appropriate and timely investigation regarding whether sufficient *natural* flow exists to meet claimed demand. If the SWRCB determines that insufficient *natural* flow exists, the SWRCB should take appropriate action to prevent those, without rights to project water, from continuing to divert project water. Preventing those without rights to project water from diverting project water would help restore the reasonable water supply reliability to local communities and protect threatened and endangered species dependent upon water from Folsom Reservoir, without increased risk to protected species in the Sacramento River or the Delta.

Sincerely,

PLACER COUNTY WATER AGENCY

A handwritten signature in black ink, appearing to read 'E. Maisch', written in a cursive style.

Einar L. Maisch, P.E.

General Manager

cc: Diane Riddle, SWRCB
Ken Emanuel, SWRCB
Les Grober, SWRCB
Roger Paterson, MWD
RWA members
Water Forum members
Board of Directors, PCWA
Dan Kelly, Somach Simmons & Dunn
Scott Morris, General Counsel, KMT&G