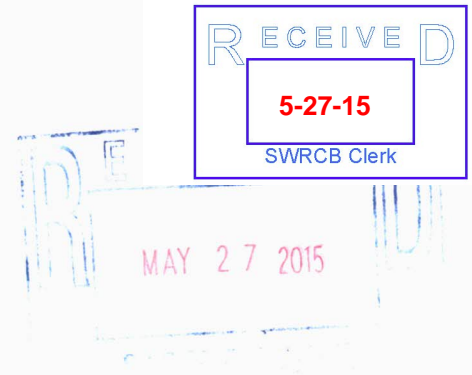


# LATE COMMENT

(5/20/15) Public Workshop- Item 9  
Drought Activities in the Bay-Delta  
Deadline: 5/14/15 by 12:00 noon



May 19, 2015



Ms. Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: May 20 Public Workshop - Drought Activities in the Bay-Delta: Curtailments**

Dear Chair Marcus:

On behalf of the thirty-four member counties of the Rural County Representatives of California (RCRC), I appreciate the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the issue of water right curtailments.

As noted in the Notice of Public Workshop, the curtailment process is designed to ensure that water is allocated in an orderly way based on the seniority of the water rights. To date curtailments in the Bay-Delta watershed have been issued due to unavailability of water for diverters of post-1914 appropriative water rights in the Sacramento, San Joaquin, and Delta watersheds. RCRC understands that additional curtailments are likely in the coming months - including potential curtailment of diversions of senior water right holders - due to severe drought conditions.

RCRC has long-standing policy in support of the water right priority system which is the foundation of California's water right law. RCRC supports the State Water Board's commitment to the water right priority system, and to making curtailment decisions based on water right priorities and water availability.

Water right curtailments, as you know, impact both the economy and environment of the affected areas. To give the public and water right holders the confidence that curtailments are being implemented in a reasonable manner, the water availability analysis must be based upon the best available data. RCRC also urges that the supporting documentation and data being used to make determinations on water availability relative to water right priority be made available for public review. This transparency is key to reassuring the public and water right holders that the decisions made by the State Water Board are based on factual information.

1215 K Street, Suite 1650, Sacramento, CA 95814 | [www.rcrcnet.org](http://www.rcrcnet.org) | 916.447.4806 | Fax: 916.448.3154

Ms. Felicia Marcus, Chair  
May 20 Public Workshop  
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In conclusion, RCRC appreciates the effort of the State Water Board to solicit input from the public and impacted water right holders. Please feel free to contact me if you have any questions at (916) 447-4806 or [kmannion@rcrcnet.org](mailto:kmannion@rcrcnet.org).

Sincerely,

A handwritten signature in black ink that reads "Kathy Mannion". The signature is written in a cursive style with a large, stylized initial "K".

KATHY MANNION  
Legislative Advocate

cc: Members, State Water Resources Control Board  
Mr. Tom Howard, Executive Director