



WESTERN REGIONAL OFFICE  
3074 Gold Canal Drive  
Rancho Cordova, CA 95670-6116  
(916) 852-2000 Fax (916) 852-2200  
[www.ducks.org](http://www.ducks.org)

March 3, 2014

Michael Buckman, Senior Environmental Scientist  
Hearings Unit Chief, Division of Water Rights  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100  
[michael.buckman@waterboards.ca.gov](mailto:michael.buckman@waterboards.ca.gov)

**RE: Objection to additions to the Temporary Urgency Change Order for the Central Valley Project and State Water Project in actions taken January 31, 2014.**

Dear Mr. Buckman and Members of the Board:

This letter is in objection to the actions taken on January 31, 2014, when the Executive Director issued an order approving additional changes to the Temporary Urgency Change Petition ("TUCP") filed by the California Department of Water Resources (DWR) and United States Bureau of Reclamation ("Reclamation").

Ducks Unlimited understands and appreciates the Governor's desire to make sure there is enough water in storage at the end of the water year to be prepared to provide "public health and safety" water for California next year if it is also dry.

However, Reclamation and DWR, as the major project operators in California, have developed their operations plans for this year and they are currently refining the numbers. They understand project operations- and the Administration can hold them accountable to provide a plan that works for California.

We believe the Administration would benefit from a clear public process with a schedule allowing DWR and Reclamation to refine their operations plans for the year (in coordination with the water users) and provide this information (including more sophisticated water balances) to the SWRCB in accordance with this schedule. The SWRCB should not take any action or adopt any orders until these plans are presented and fully understood.

Given that various Sacramento Valley settlement contracts become effective April 1, there continues to be additional time to monitor March precipitation to more fully assess 2014 water availability and refine operations accordingly.

Previous administrations have reached out to water users in California and they helped develop creative solutions to get the state through these critical periods in the past. The Administration should immediately reach out to water users throughout the state and seek their assistance to meet the Administration's objectives.

Ducks Unlimited looks forward to working productively and proactively with the State Water Resources Control Board moving forward to ensure a balanced and equitable outcome for all concerns, whether urban, agricultural, or environmental.

Sincerely,



Mark E. Biddlecomb  
Director of Operations