



PLACER COUNTY WATER AGENCY
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March 10, 2014
File No. WF 24864

VIA E-MAIL - Tom.howard@waterboards.ca.gov

Mr. Tom Howard
Executive Director
State Water Resources Control Board
Post Office Box 100
Sacramento, California 95812-0100

SUBJECT: MODIFIED ANNOUNCEMENT for Revised Order on Temporary Urgency
Change Petition

Dear Mr. Howard:

Placer County Water Agency (PCWA) is the primary water resource agency for Placer County, California. PCWA carries out a broad range of responsibilities including water resource planning and management, retail and wholesale supply of irrigation water and drinking water, serving more than 38,500 water accounts in several water service areas, and production of hydroelectric energy in Placer County's 1,500 square mile area. The purpose of this letter is, as provided in the SWRCB's March 3, 2014 Modified Announcement for Revised Order on Temporary Urgency Change Petition (TUCP) for the Central Valley Project (CVP) and the State Water Project (SWP), to provide PCWA's comments on the TUCP Order and potential modifications to that Order.

The TUCP process, to date, appears to be focused on exports and the needs of various export areas. Such a focus ignores the needs of communities in the areas of origin and has the potential to yield devastating effects on our local water supplies. As this process moves forward, the SWRCB should mandate that the United States Bureau of Reclamation (USBR) and the California Department of Water Resources provide a detailed analysis and accounting of the proposed uses of water exported since July 2013, including a full and detailed analysis of water diverted at the export facilities for "health and safety" needs.

In addition, the SWRCB should mandate that the USBR clearly define how Folsom Reservoir will be operated beyond the near term. Any order granting temporary changes to water rights or other related requirements that affect the operation of Folsom Reservoir must not have the

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effect of depriving the areas of origin of critical water supplies. The USBR must demonstrate that it will protect local water supplies and must demonstrate that any changes to Folsom operations that result from an order granting temporary change will not put us in the same place as we were going into the fall of 2013.

PCWA believes that a plan for operating Folsom Reservoir to meet water supply and Lower American River needs in the American River region, as described in the comment letter submitted by the cities of Roseville and Folsom, and the San Juan Water District, would be beneficial. PCWA would work collaboratively with the USBR and other regional stakeholders on such a plan.

We appreciate the opportunity to comment on the terms that the SWRCB may include in its revised temporary order for CVP and SWP operations. If you have any questions, please do not hesitate to contact me.

Sincerely,

PLACER COUNTY WATER AGENCY

A handwritten signature in blue ink, appearing to read "David A. Breninger". The signature is fluid and cursive, with a large initial "D" and "B".

David A. Breninger
General Manager

c: Felicia Marcus
Frances Spivy-Weber
Tam Dudoc
Steven Moore
Dorene D'Adamo
Michael Buckman
Tom Gohring