

Alternative Compliance Plan, Peyton Pacific Properties, LLC:

Section D, Insert 3(b)

The Pettyjohn Ranch has five water rights appurtenant to it:

Reports of Licensee:

Permit 14970, App 21976, License 8886

Permit 14721, App 21973, License 8883

Permit 14722, App 21974, License 8884

Permit 14723, App 21975, License 8885

Supplemental Statement:

Application S010853 (also pre-1914 right with 1913 priority date)

These water rights, referred to hereafter as the “Pettyjohn water rights”, are comprised of 12 points of diversion and 12 stockponds. With the de minimis exception explained in paragraph 4, each of the Pettyjohn water rights is used exclusively for stockwatering purposes and the places of use are limited to the reservoirs and points depicted in **Exhibit 1**, a legal description of which is included in each water right. The Pettyjohn water rights were developed and are used in an integrated fashion on the Pettyjohn Ranch, and this alternative compliance plan is submitted as a comprehensive and integrated alternative compliance plan for each of the Pettyjohn water rights.

The points of diversion and stockponds of the Pettyjohn water rights are in locations where it is impractical and unduly expensive to attempt to install meters or measurement weirs. The water diverted is used for stockwatering for livestock on the Pettyjohn Ranch, and the quantity of water diverted and put to beneficial use for livestock stockwatering can be measured by calculating the number of livestock watered on the property and then calculating the duty of water use for livestock stockwatering on a monthly basis based on the annual use measurements for livestock described by the State Water Resources Control Board (“SWRCB”) in California Code of Regulations, Title 23, section 697, subdivision (b).

Measurement except on the basis of the calculated livestock duty of consumption during the stockwatering season is neither accurate nor practical. Many of the stockwater ponds and points of diversion cannot be accessed by vehicle, and power is unavailable. Generators and solar power systems could not be fueled or maintained in a routine manner due to the remote nature of many points of diversion and stockponds. Further, the use of meters to calculate livestock water consumption would fail to distinguish and account for evaporation, wildlife water consumption, and groundwater depletions, and meters would fail to differentiate between diverted water and natural inflow entering the stockwater ponds attributable to rainfall or other sources. Meters would also fail to account for water diverted at the points of diversion but consumed by livestock before the water reached the stockwater ponds. It is unlikely that metering mechanisms could be engineered for some of the stockponds and points of diversion as some appear to be naturally occurring and not suitable for the installation of metering weirs. The integrated and overlapping nature of the Pettyjohn water system also makes the development of a metered water system that segregated quantities of water by tributary source, point of diversion, and stockwater pond place of use impractical. Quantifying use of water by the number of cows on the property rather than diversion or inflow measurements will also allow water

which spills out of or flows through Pettyjohn stockwater ponds and which is not used on the Pettyjohn ranch to be reported by downstream landowners who put such abandoned or bypassed flows to beneficial use.

All Pettyjohn water rights are limited to stockwater purposes with the de minimis exception of S10853 which, in addition to supplying stockwater to the Pettyjohn ranch along with the other Pettyjohn water rights, also supplies a small amount of water to the house on Pettyjohn Ranch which serves as the Ranch headquarters. The water supplied to the Pettyjohn Ranch headquarters house is used for human consumption and landscaping and fire prevention and suppression around the house. The Pettyjohn Ranch headquarters house uses of water pursuant to S10853 will be accounted for in the alternative compliance plan by calculating the average monthly consumption of water as if a family of four (4) resided at the headquarters using the ten (10) year baseline gallons per-capita per-day figure of 229 gallons per-capita per-day (GPCD) from the 2015 Urban Water Management Plan for the City of Anderson, California which is 334,340 gallons and 1.02 AF for a family of four (4) on an annual basis (83,585 gallons or .25 Acre Feet per-person annually), and 27,860 gallons or .08 AF for a family of four (4) on a monthly basis (6965 gallons or .02 AF per-person monthly), and submitting the calculated figure on a monthly basis in the alternative compliance plan.

Section D, Insert (4)

We will report the number of cows on the property during each month and the typical water consumption duty of the cows based on the figures relied on by the State Water Resources Control Board ("SWRCB") in California Code of Regulations, Title 23, section 697, subdivision (b). The total usage will be tabulated for each month. Water used for the house on Pettyjohn Ranch house headquarters house under S10853 for domestic, landscaping, and fire prevention and suppression use will be tabulated for each month based on the average monthly consumption of water for a typical California mountain county household.



Res # 7
Licen 8885
A 21975
16.16 AF
✓

Res # 10
Licen 8884
1974
1.9 AF
✓

Res # 9
Licen 8885
A 21975
7.0 AF
✓

Res # 6
Licen 8884
A 21974
6.8 AF
✓

Res # 2
Licen 8883
A 21973
1.0 AF
✓
Summer switch

Res # 1
Licen 8883
A 21973
1.9 AF
✓
Summer switch

Res # 4
Licen 8883
A 21973
50.0853
✓
Summer switch

Res 13
88L8886
A 21976
2 AF
POU-removal
Tributary to
Cottonwood
✓

Res # 11
Licen 8886
A 21976
2.3 AF
POU-removal
Tributary to
Cottonwood
✓

Res # 5
Licen 8884
A 21974
2.2 AF
✓

Res # 12
Licen 8884
A 21974
1.1 AF
✓

USA

E(4)

All properties owned by Peyton Pacific Properties, LLC, Texas Limited Liability Company:

A.P.N.: 019-120-005-000, 019-180-002-000, 021-010-006-000, 021-010-008-000, 021-020-006-000, 021-030-009-000, 021-050-004-000, 021-050-005-000, 021-050-007-000, 021-050-008-000, 021-060-001-000, 021-060-002-000, 021-060-003-000, 021-060-004-000, 021-060-005-000, 021-060-006-000, 021-060-010-000, 021-070-001-000, 021-070-003-000, 021-070-004-000, 021-090-001-000, 021-090-002-000, 021-090-003-000, 021-090-004-000, 021-090-006-000, 021-090-007-000, 021-090-009-000, 021-100-001-000, 021-100-002-000, 021-100-003-000, 021-100-005-000, 021-100-006-000, 021-100-008-000, 021-130-001-000, 021-130-002-000, 021-130-003-000, 021-140-001-000