

**MONTAGUE WATER CONSERVATION DISTRICT
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August 5, 2022

Erik Ekdahl
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: Montague Water Conservation District - Request to amend Petition for Health and Human Safety:

MWCD requests to amend its LCS/Health and Human Safety petition to the SWRCB. Over the past several days, the USFS has decided to move its fire camp for the McKinney Fire complex from Yreka to Montague. The McKinney Fire started on July 29th and is threatening the City of Yreka and Fort Jones. As of August 5th there are over 2,400 personnel working on the fire and nearly 60,000 acres have burned in just a week. The fire is 10% contained with both CDF and the USFS jointly fighting the fire. Other local fires including the China, Yeti and Alex Fires demand resources within the western Siskiyou County. Governor Newsome declared the McKinney Fire and Klamath National Forest to be a State of Emergency on July 29th. At this point, CDF will keep its fire camp in Yreka at the fairgrounds. MWCD is not sure how many people will move to the USFS fire camp in Montague.

The City of Montague has contacted MWCD and has requested more water to be delivered to the City as a result of the USFS McKinney Fire camp being moved to Montague. Prior to the fire, MWCD had been delivering 0.5 cfs municipal water to the City of Montague with periods where there were no releases for municipal/Industrial use. Our objective has been to provide a low continuous volume of water for municipal/industrial use in Montague in 2022.

On August 2nd the City of Montague requested an additional 0.25 cfs to be delivered as a result of USFS fire camp establishing in the City of Montague increasing the volume of water released to the City of Montague from .5 cfs to .75 cfs. We do not know how much water the fire camp will need as we do not know the size or water demand the camp and fire fighting tactics will require. We also do not know the duration the camp will remain in Montague.

We do know City of Montague hydrants are being used to fill water trucks, settle dust and just handle a significant increase in population. Water delivered to the City is also sought to supply aerial firefighting tactics located at Siskiyou County Airport near Montague. The School and Community Center are being used by the USFS staff. A vehicle washing station may be established. Aside from fire fighting and maintenance purposes, It is safe to estimate that the population on Montague could double as a result

of fire camp. We feel an increase of 0.5-1.0 acre feet per day may result as a condition of adding the fire camp and use of water for firefighting purposes. This fire could last into late October or nearly 100 days. Therefore MWCD is requesting SWRCB approval for an additional 150 acre feet to be used to support the McKinney Fire Camp in the event the fire lasts for several months and/or the fire camp and purposes of water increases.

MWCD feels like sufficient water is available in Dwinnell Reservoir and Flying L pumps to provide for potential increased use. As of 8/4/2022, 3,150 acre feet remain in Dwinnell Reservoir. While MWCD has a significant volume of water yet to deliver, a majority of the water stored for prior rights and environmental releases has been provided to date. All releases would be in accordance with water quality requirements and from water that is currently in storage at Dwinnell Reservoir or provided from the Flying L pumps including temperature and monitoring, established under MWCD's SHA commitments. Please contact Gary Black (gblack@sisqtel.net or 530 598-5800) on behalf of MWCD regarding this request for amendment.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Faris".

Lisa Faris, Office Manager
Montague Water Conservation District
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mwcd@att.net

Montague Water Conservation District Proposal for Health and Safety Exemption and Individual Local Cooperative Solution (LCS) for 2022

MWCD Health and Safety Exemption: MWCD intends to use water from Dwinnell Reservoir and groundwater (Flying L pumps) to provide municipal and industrial water to the City of Montague. As a result of the SWRCB Order, MWCD's Flying L wells are curtailed based on priority. As a result of this application, MWCD is not asserting an opinion as to whether SWRCB has authority to curtail the MWCD's Flying L wells that are pumping percolating groundwater.

Municipal: MWCD proposes to release up to 430 acre feet for municipal and industrial purposes for the City of Montague in 2022. MWCD intends to release approximately 1.0 cfs from its various water sources at Dwinnell Reservoir to the Shasta River for re-diversion approximately 24 river miles downstream. MWCD will divert 0.70 - .75 cfs at the existing compliant point of re-diversion, allowing surplus water as requested by the Scott and Shasta Watermaster District (SSWD). Releases will be less than 18°C. Watermaster and SWRCB will be noticed 48 hrs prior to releasing flows for municipal and 48 hrs prior to turning off releases. Term of exemption will extend from 5/1/2022 through 12/31/2022.

Water Quality Measure: As a measure to maintain water quality, MWCD uses the Flying L Pumps as a water quality measure to keep flows released to the Shasta River under 18°C at MWCD's verification point on the Shasta River. The volume of water provided to the Shasta River from Flying L Pumps to provide temperature control will be used for either municipal, environmental or for prior rights. The purpose of use will vary dependent on storage in Dwinnell, time of year and water quality parameters. An estimated 1,280 acre feet will be provided to the Shasta River of which 430 af will be used for municipal and the remainder used for temperature control while delivering for environmental or serving prior rights.

Inefficiencies that require 430 af to meet municipal needs of Montague include:

- 25%-30% more water released than diverted
- Losses in open ditch transmission
- Losses in earthen storage reservoir(s) at City of Montague
- Currently unknown industrial use
- City pool, park, lawns

Individual LCS for MWCD at Shasta River and Parks Creek: MWCD is seeking a Local Cooperative Solution on the Shasta River and Parks Creek. MWCD has an active conservation plan with NOAA and CDFW that contributes to the protection and enhancement of Coho Salmon, other Salmonids and other cold water dependent species. MWCD's Site Plan and Safe Harbor Agreement constitute its approved conservation plan that was in effect prior to the SWRCB's Order which results in curtailment based upon minimum flow requirements measured in the canyon of the Shasta River. MWCD's SHA commitments are specific to meeting tributary flow and water quality parameters in the upper reaches of the watershed that are critical for Coho Salmon and used throughout the calendar year.

Shasta River: Under MWCD's SHA , the volume of water provided for instream benefit under a very dry year is 2,662 af. A daily schedule was developed with CDFW and NOAA that is protective of Coho Salmon based on life stage needs throughout the year. Under the proposed LCS for the Shasta River MWCD will provide 3,182 af for instream benefit in 2022 to benefit the upper Shasta River (20% increase in provided flow). 3,182 acre feet is 40% of MWCD's maximum storage volume (7,950 af) in 2022 and is therefore, an immense contribution. CDFW is a party to both the instream schedule for the SHA and the SWRCB Order. MWCD is seeking assistance in complying with both terms and is therefore submitting a Health and Safety Exemption and an LCS in coordination with CDFW, NOAA, NCRWQCB and SWRCB. Additional water quality monitoring may occur in 2022. Based on results of monitoring, MWCD may have additional water quality parameters that affect quantity of source of water released to the Shasta River. If additional monitoring occurs it will be conducted with SWRCB,NOAA, NCRWQCB and CDFW.

In addition to the significant percentage of water provided for instream benefit, MWCD also proposes to operate the Flying L wells to supply up to 4.5-5.0 cfs of cold groundwater to the Shasta River to function as a temperature control. MWCD commits that flow released to the Shasta River will be 18°C or colder throughout the year as measured at MWCD's verification point below Dwinnell Dam on the Shasta River. MWCD's Flying L pumps will be used for municipal, environmental and servicing prior rights purposes and a water quality measure from approximately 5/15 -9/30 to ensure water is kept below 18°C in the Shasta River at MWCD's verification point. An estimated 1,280 AF from the Flying L Pumps will be used in 2022 for municipal, environmental prior rights and water quality control. Depending on remaining storage in September of 2022, MWCD may have water remaining in storage that could be made available for fall flow transactions to enhance flows for migrating adult Chinook Salmon.

Parks Creek: As a compromise and justification for an LCS, MWCD committed and abided by commitment to by-pass 20 cfs prior to diverting from MWCD's Parks Creek diversion in the fall/winter of 2021 and will commit the same in 2022 from 10/1-12/31. MWCD's current requirement under its SHA agreement is to by-pass 6.0 cfs during this period until MWCD's proposed infrastructure improvement project is implemented on it Parks Creek POD. MWCD will maintain its diversion facility and real time gages to verify compliance and provide fish passage as best as possible.

In order to comply with SWRCBs' order MWCD will be using alternative option to curtailment provided in SWRCB's order including ____section E to exchange water already provided for instream benefit with water provided from Flying L wells proposed during the remainder or the calendar year. The volume of

water provided for instream benefit in 2022 (3,182 af) more than doubles the maximum value of 850 af delivered to the Shasta River via the Flying L Pumps for consumptive use.