

STATE OF CALIFORNIA
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
STATE WATER RESOURCES CONTROL BOARD

DIVISION OF WATER RIGHTS

**IN THE MATTER OF LICENSE 11118 (APPLICATION 14804)
OF SOUTH SUTTER WATER DISTRICT**

**PETITION FOR TEMPORARY CHANGE INVOLVING THE TRANSFER OF UP TO
2,299 ACRE-FEET OF WATER TO WOODLAND-DAVIS CLEAN WATER AGENCY**

SOURCE: Bear River

COUNTIES: Placer and Yuba

ORDER APPROVING TEMPORARY CHANGES

BY THE DEPUTY DIRECTOR FOR WATER RIGHTS:

1.0 OVERVIEW

On July 12, 2023, the South Sutter Water District (SSWD or Petitioner) filed with the State Water Resources Control Board (State Water Board), Division of Water Rights (Division), a Petition for Temporary Change (Petition) Involving the Transfer of Water under water right License 11118 (Application 14804), pursuant to Water Code section 1725 et seq. Under the proposed transfer, up to 2,299 acre-feet (af) of water will be transferred to Woodland-Davis Clean Water Agency (WDCWA) from November 1, 2023 through March 31, 2024.

2.0 TRANSFER TYPE

SSWD originally described the transfer as a hybrid type where surface water would be made available for transfer to WDCWA by groundwater substitution in lieu of diverting water under License 11118. SSWD also described that its agricultural customers will pump groundwater in lieu of receiving water released from Camp Far West Reservoir (Reservoir) and the Camp Far West Diversion Dam (Diversion Dam), and that water would instead be released downstream from the reservoir for rediversion by WDCWA. By email, dated August 31, 2023, Division staff informed SSWD that a reservoir release transfer would be a more appropriate characterization of the transfer and that it will

process the transfer as such, based on the proposed transfer operations. The Petitioner did not object to such characterization and thus will make water available by releasing water that would otherwise remain in storage in the Reservoir under License 11118.

2.1 Reservoir Reoperation

This transfer involves water currently stored in the Reservoir. Refill criteria developed in coordination with the Department of Water Resources (DWR) and the U.S. Bureau of Reclamation (Reclamation) are required to ensure that future refill of the reservoir space made available in the Reservoir from this transfer does not adversely impact the State Water Project (SWP), Central Valley Project (CVP), or other legal users of water. Pursuant to the criteria, any refill occurring during balanced conditions in the Sacramento-San Joaquin Delta Estuary¹ (Delta) is subject to repayment of water to DWR and Reclamation according to a schedule agreed to by SSWD, DWR, and Reclamation.

3.0 BACKGROUND

3.1 Summary of South Sutter Water District's License 11118

License 11118 (Application 14804), which has a priority date of May 12, 1952, authorizes the diversion to storage in the Reservoir of up to 58,370 af of water per year from the Bear River between October 1 of each year to June 30 of the succeeding year. License 11118 also authorizes the direct diversion of up to 330 cubic feet per second (cfs) and rediversion from storage at the Diversion Dam between May 1 and September 1 of each year. The Diversion Dam is located about one mile downstream of the Reservoir.

Water diverted under License 11118 is used for irrigation and domestic purposes within the authorized places of use, as well as incidental power generation. The authorized places of use under License 11118 are a net 59,000 acres within a gross area of 65,796 acres for domestic and irrigation uses within SSWD, 4,180 acres for irrigation use within the Camp Far West Irrigation District (CFWID) (including 102 acres outside SSWD's boundaries and served under contract), and a power generation plant located on SSWD's conveyance canal.

¹ The Delta is considered to be in balanced conditions when the SWP and CVP agree that releases from the upstream reservoirs, plus unregulated flow, approximately equal water supply needed to meet Sacramento Valley in-basin uses and Project exports. During balanced conditions in the Delta when water must be withdrawn from storage to meet Sacramento Valley and Delta Requirements, 75 percent of the responsibility to withdraw from storage is borne by the CVP and 25 percent by the SWP.

In order to protect fish and wildlife resources in the Bear River downstream of the Diversion Dam, SSWD is required to bypass 25 cfs between April 1 and June 30 of each year and 10 cfs between July 1 of each year to March 31 of the succeeding year. SSWD's petition states that the water intended for transfer is in addition to those required releases.

In 2000, SSWD and CFWD entered into the Bay-Delta Settlement Agreement (Agreement) with DWR to meet the Bear River watershed's responsibilities for Bay-Delta flow objectives. The Agreement provides that DWR may request SSWD to release up to 4,400 af of water from the Reservoir during July 1 through September 30 of each Dry Year and Critical Year². SSWD's petition states that the water intended for transfer is in addition to releases that may be requested by DWR pursuant to the Agreement.

3.2 Description of the Proposed Temporary Changes

The proposed transfer would include the following temporary changes to SSWD's water right License 11118:

- 1) Add the WDCWA's Pumping Plant as an additional point of rediversion;
- 2) Add the WDCWA's service area as shown on maps filed with the Division under water right Application 30358 as an additional place of use; and
- 3) Add municipal and industrial as additional purposes of use.

3.3 Water Available for Transfer

SSWD will deliver previously stored surface water to WDCWA. The quantity of surface water proposed to be delivered by SSWD to WDCWA will be made available by releases of up to 2,299 af of water currently stored in the Reservoir. This transfer of previously stored surface water will involve the delivery of water to WDCWA and refill of the Reservoir, which normally occurs during periods of high runoff. Under the proposed transfer, releases of stored water would be increased compared to conditions in the absence of the proposed temporary transfer.

² "Dry Year" and "Critical Year" shall mean those years as defined on Page 23 of the State Water Board's *Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary*, May 1995.

4.0 PUBLIC NOTICE AND COMMENTS ON THE PROPOSED TEMPORARY CHANGE

On July 24, 2023, public notice of the Petition was provided by posting on the Division's website and via the State Water Board's electronic subscription mailing list and mailed via first-class mail to interested parties. Timely comments regarding the proposed temporary change were submitted by the California Department of Fish and Wildlife (CDFW), DWR, and Reclamation. These comments and the Petitioner and State Water Board's responses are briefly summarized below.

4.1 Comments of CDFW

By letter dated August 16, 2023, CDFW commented on the proposed water transfer as summarized below.

- 1) CDFW recommended a more protective groundwater level trigger to reduce or cease pumping groundwater pursuant to the transfer to avoid adverse impacts on groundwater dependent ecosystems after sequential dry or critically dry years. Additionally, the Petitioner should ensure that the groundwater pumping reduction and cessation triggers used during the transfer period are at least as protective as the sustainable management criteria in the applicable Subbasin Groundwater Sustainability Plans.
- 2) The minimum stream depletion factor (SDF) of 13 percent likely underestimates the surface water depletion that will result from transfer pumping and may result in an overestimation of surface water available to be transferred. CDFW recommended that the Petitioner present information that scientifically justifies the use of 13 percent SDF, or the development of site-specific and hydrologic-specific SDFs.
- 3) Water transfer flows may attract steelhead/rainbow trout and fall-run Chinook into the Bear River, and then lower flow conditions following the transfer would not be able to support the species that have entered the system. CDFW recommended that the transfer flow be held at 15 cfs. Additionally, CDFW requests a review of the proposed transfer schedule within 15 days of the State Water Board's approval and notification in the winter when either the reservoir begins to spill and the transfer stops or if the Petitioner plans to continue the transfer through March 2024.

Petitioner and State Water Board Response:

CDFW's comments #1 and #2 are not applicable as those are concerns related to groundwater substitution transfers. This proposed transfer is a reservoir release and thus the Petitioner is not subject to groundwater substitution related conditions. SSWD

responded by email, dated, September 6, 2023, and indicated that it agrees to the conditions per comment #3 for this transfer. Thus, the Order is conditioned to require SSWD to hold transfer flow at rate up to 15 cfs and to provide CDFW a proposed transfer release schedule within 15 days following the issuance of this Order.

4.2 Comments of DWR

On August 10, 2023, DWR commented on the proposed transfer. DWR requests that the Order granting the change be conditioned on the following:

- 1) The proposed transfer is in compliance with sections 3.5 and 3.6 of the Draft Technical Information. DWR would like to review South Sutter's Monitoring Program Plan and Mitigation Program Plan (collectively, Plans) and the implementation of the Plans and be able to provide comments to the Board regarding their sufficiency. The Plans should include: a list of wells used to monitor water level for the transfer, a description of how land surface elevation changes will be measured and reported, and all available relevant information about the production wells used in the water transfer;
- 2) South Sutter provides diversion data to South Sutter's main canal as a supplemental measure to demonstrate water made available for groundwater substitution pumping. The diversion data should show reduced diversions to the main canal for deliveries within South Sutter's service area because of the transfer;
- 3) South Sutter submits a complete transfer proposal using the DWR's Water Transfers Information Management System (WTIMS) online database, at <https://info.water.ca.gov/wtims/>. The proposal is to include additional transfer and monitoring well information, be consistent with the Draft Technical Information, and demonstrate a lack of adverse impacts caused by groundwater substitution transfers; and
- 4) To ensure groundwater level data reporting consistency, all data collected for the transfer should be entered into DWR's groundwater level database through CASGEM or SGMA Portal.

Petitioner and State Water Board Response:

See State Water Board's response in Section 4.1 of this Order pertaining to groundwater substitution transfer conditions. In an email, dated August 31, 2023, the Petitioner indicated that they will enter the information into WTIMS. The Order is conditioned to require SSWD to enter the applicable transfer information into WTIMS, given the important role of WTIMS in compiling information related to temporary

transfers. Additionally, this Order is conditioned to require SSWD to provide canal diversion data in an accounting memorandum.

4.3 Comments of Reclamation

By letter dated August 23, 2023, Reclamation commented on the proposed transfer. Reclamation asserted that the Petitioner is attempting to avail itself of the exception to the groundwater pumping measurement methodology for participating wells discussed in the Draft Technical Information for Preparing Water Transfer Proposals, dated December 2019. Thus, Reclamation stated that a refill agreement is necessary in order for the proposed temporary change to not have an adverse effect on the water rights or operations of the CVP. Reclamation requested that the Order approving the proposed transfer be subject to a refill agreement between SSWD, Reclamation, and DWR.

State Water Board Response:

As stated in Section 2.1 of this Order, refill criteria are needed to ensure that the refill of the Reservoir resulting from the proposed temporary change does not adversely impact operations and/or water rights of the SWP and CVP. The transfer is conditioned that SSWD is subject to a refill criteria agreement with DWR and Reclamation ensuring that future refill of any storage space in the Reservoir created by the transfer will not reduce the amount of water that DWR, Reclamation, or other legal water users, could divert under their water rights. This Order requires SSWD to comply with the refill criteria.

5.0 COMPLIANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Water Code section 1729 exempts temporary changes involving a transfer of water from the requirements of the California Environmental Quality Act. (Pub. Resources Code, § 21000 et seq.) The State Water Board will file a Notice of Exemption for this project following the issuance of this Order.

6.0 CRITERIA FOR APPROVING THE PROPOSED TEMPORARY CHANGES

Pursuant to Water Code section 1725, “a permittee or licensee may temporarily change the point of diversion, place of use, or purpose of use due to a transfer or exchange of water or water rights if the transfer would involve only the amount of water that would have been consumptively used or stored by the permittee or licensee in the absence of the proposed temporary change, would not injure any legal user of the water, and would not unreasonably affect fish, wildlife, or other instream beneficial uses.” (Wat. Code, §§ 1725 and 1725.5.)

The State Water Board shall approve a temporary change involving the transfer of water under Water Code section 1725 et seq., if it determines that a preponderance of the evidence shows both of the following:

- a. The proposed change would not injure any legal user of water, during any potential hydrologic condition that the State Water Board determines is likely to occur during the proposed change, through significant changes in water quantity, water quality, timing of diversion or use, consumptive use of water, or return flows.
- b. The proposed change would not unreasonably affect fish, wildlife, or other instream beneficial uses.

(Wat. Code, § 1728, subd. (b).)

In addition, the proposed change must involve only the amount of water that would have been consumptively used or stored in the absence of the temporary change. (Wat. Code, § 1726, subd. (e).)

Temporary changes pursuant to Water Code section 1725 may be effective for a period of up to one year from the date of approval. (Wat. Code, § 1725.5) “The one-year period does not include any time required for monitoring, reporting, or mitigation before or after the temporary change is carried out.” (*Ibid.*)

The State Water Board also has an independent obligation to consider the effect of the proposed project on public trust resources and to protect those resources where feasible. (*National Audubon Society v. Superior Court* (1983) 33 Cal.3d 419.) The State Water Board considers the evaluation of public trust resources as part of its evaluation of impacts to fish, wildlife, or other instream beneficial uses under Water Code section 1728, subdivision (b)(2).

7.0 REQUIRED FINDINGS OF FACT

7.1 Availability of Water for Transfer

Before approving a temporary change due to a transfer or exchange of water pursuant to Chapter 10.5 of part 2 of Division 2 of the Water Code, the State Water Board must find that the transfer would only involve the amount of water that would have been consumptively used or stored by the permittee or licensee in the absence of the proposed temporary change or conserved pursuant to Section 1011. (Wat. Code, §§ 1725, 1725.5, 1726.) Water Code section 1725.5 defines “consumptively used” to mean “the amount of water which has been consumed through use by evapotranspiration, has percolated underground, or has been otherwise removed from

use in the downstream water supply as a result of direct diversion.” The water proposed for transfer is currently stored in the Reservoir pursuant to the terms of License 11118.

As of September 28, 2023, the Reservoir held 17,839 af of water in storage, which is approximately 22 percent of the reservoir’s capacity. The Petitioner indicated that in the absence of the proposed change, the 2,299 af of water proposed for transfer would have remained in storage. Petitioner provided data on monthly withdrawals from the reservoir from 2011 to 2022; total withdrawals are a combination of the volumes delivered into SSWD’s Main Canal, the deliveries to CFWID, and downstream releases to meet instream flow requirements. Average releases in October from 2011 to 2022 were 3,396 af, with a maximum volume of 6,569 af occurring in 2019. Given that the irrigation season ends in October, the only withdrawal for the remainder of the proposed transfer period would be for instream flow requirements, which would be a total volume of 2,994 af. Based on these potential drawdowns of the Reservoir storage, the amount remaining in storage in the absence of the transfer would be between 8,276 af (based on the maximum observed October withdrawals) and 11,449 af (based on average observed October withdrawals).

Under License 11118, SSWD can both directly divert and collect water to storage. SSWD would not provide water by direct diversion under License 11118 to WDCWA; this transfer includes a condition requiring only delivery of stored water to WDCWA.

In light of the above, I find in accordance with Water Code section 1726, subdivision (e) that the water proposed for transfer pursuant to this Order would be consumptively used or stored in the absence of the proposed temporary change.

7.2 No Injury to Other Legal Users of the Water

Before approving a temporary change due to a transfer or exchange of water pursuant to Article 1 of Chapter 10.5 of Part 2 of Division 2 of the Water Code, the State Water Board must find that the transfer would not injure any legal user of the water during any potential hydrologic condition that the Board determines is likely to occur during the proposed change, through significant changes in water quantity, water quality, timing of diversion or use, consumptive use of the water, or reduction in return flows. (Wat. Code §1728, subd. (b)(1).)

This Order requires SSWD to comply with refill criteria to ensure that future refill of the reservoir space made available in the Reservoir from this transfer does not adversely impact the SWP or CVP. SSWD has indicated it has sufficient supply to continue the same surface water deliveries to its existing customers with or without the proposed temporary water transfer. In addition, SSWD is required to release water to meet its other existing downstream commitments and requirements on the Bear River; this approval does not change those obligations. Therefore, there will be no downstream

change of the streamflow, water quality, timing of diversion, return flows, effects on legal users of water, or change in the purposes of use authorized by License 11118 during the period of the proposed temporary transfer.

In light of the above, I find in accordance with Water Code section 1728, subdivision (b)(1) that the proposed temporary transfer will not injure any legal user of the water.

7.3 No Unreasonable Effect on Fish, Wildlife, or Other Instream Beneficial Uses

Before approving a temporary change due to a transfer or exchange of water, the State Water Board must find that the proposed change would not unreasonably affect fish, wildlife, or other instream beneficial uses (Wat. Code, § 1728, subd. (b)(2)). The Petitioner provided CDFW and the Central Valley Regional Water Quality Control Board (Central Valley Water Board) with a copy of the Petition in accordance with California Code of Regulations, title 23, section 794, subdivision (c). CDFW provided comments regarding the transfer as described in Section 4.1 of this Order. Condition 11 has been included in this Order based on CDFW's comments. The Central Valley Water Board did not provide any comments to the State Water Board regarding potential effects of the proposed changes on water quality, fish, wildlife, and other instream beneficial uses.

In general, North of Delta transfers result in an incremental increase in instream flows between the Petitioner's point of diversion and the location where the water is removed from the stream system. The increase in flows is not anticipated to be harmful to instream resources, provided that the transfer water does not cause instream temperatures to increase to harmful levels and also does not result in false fish attraction flows to streams not suited for fish rearing. No information is available that suggests the transfer flows as conditioned in this Order will contribute to false fish attraction flows or significantly change stream temperatures or water quality. The transfer will also be subject to all applicable federal and State Endangered Species Act requirements, including applicable biological opinions, Incidental Take Permits, court orders, and any other conditions imposed by other regulatory agencies.

In light of the above, I find in accordance with Water Code section 1728, subdivision (b)(2) that the proposed transfer will not unreasonably affect fish, wildlife, or other instream beneficial uses.

8.0 STATE WATER BOARD'S DELEGATION OF AUTHORITY

On June 5, 2012, the State Water Board adopted Resolution 2012-0029, delegating to the Deputy Director for Water Rights the authority to act on petitions for temporary change if the State Water Board does not hold a hearing. This Order is adopted pursuant to the delegation of authority in Section 4.4.2 of Resolution 2012-0029 and the Deputy Director for Water Rights redelegation of authority dated April 20, 2023.

9.0 CONCLUSIONS

The State Water Board has adequate information in its files to make the evaluation required by Water Code section 1725, and therefore I find as follows:

I conclude that, based on the available evidence:

1. The proposed transfer involves only an amount of water that would have been consumptively used or stored in the absence of the temporary change.
2. The proposed temporary change will neither injure, nor unreasonably affect, any legal user of water, including during any potential hydrologic condition that the Board determines is likely to occur during the proposed change, through significant changes in water quantity, water quality, timing of diversion or use, consumptive use of water, or return flows.
3. The proposed temporary change will not have an unreasonable effect upon fish, wildlife, or other instream beneficial uses.

ORDER

NOW, THEREFORE, IT IS ORDERED that the petition filed by the South Sutter Water District (SSWD) for temporary change for the transfer of up to 2,299 acre-feet (af) of water under License 11118 is approved.

All existing terms and conditions of License 11118 remain in effect, except as temporarily amended by the following provisions:

1. The transfer of water is limited to the period commencing on November 1, 2023 and continuing through March 31, 2024.
2. Only water previously stored in Camp Far West Reservoir (Reservoir) may be transferred. Water shall not be provided to Woodland-Davis Clean Water Agency (WDCWA) by direct diversion.
3. The following point of redirection is temporarily added to License 11118. The water diverted at these facilities is limited to the quantities made available as transfer water, as specified above:

WDCWA Pumping Plant
North 2,008,200 feet and East 6,667,300 feet,
California Coordinate System of 1983, Zone 2,

being within NE¼ of NW¼ of projected Section 34, Township 10 North, Range 3 East, Mount Diablo Base and Meridian.

4. The place of use under License 11118 is temporarily amended to include the WDCWA service area as shown on maps filed with the Division of Water Rights under water right Application 30358.
5. Municipal and Industrial are temporarily added as purposes of use.
6. During the period of the transfer, SSWD shall comply with applicable terms and conditions imposed by other regulatory agencies. This Order shall not be construed as authorizing the violation of any agreement entered into by SSWD.
7. SSWD shall execute a refill criteria agreement between the Department of Water Resources (DWR), U.S. Bureau of Reclamation (Reclamation), and SSWD for the transfer approved by this Order. Documentation that acceptable refill criteria have been agreed to by DWR, Reclamation, and SSWD shall be submitted to the Deputy Director for Water Rights (Deputy Director) within 15 days of the date of execution of the agreement. The refill criteria shall govern the conditions under which refill of the water released pursuant to this Order occurs, including the conditions under which refill impacts may accrue and how SSWD shall rectify any impacts. At the conclusion of refilling water in the Reservoir for the water released pursuant to this Order, if a refill impact has occurred, SSWD shall release the amount of water identified in the refill criteria to DWR and Reclamation in a manner and on a schedule agreed to between SSWD, DWR, and Reclamation. Any release required pursuant to this paragraph shall be conducted in a manner that does not injure any legal user of water and does not unreasonably affect fish, wildlife, or other instream beneficial uses.
8. Within 90 days of completion of the transfer, SSWD shall provide to the Deputy Director a report describing the transfer authorized by this Order. The report shall include average daily release rates and corresponding volume of water released from the Reservoir as a result of this transfer (reported on a daily basis).
9. SSWD must finalize the accounting methodology developed pursuant to Condition 5 of the June 3, 2022, Order approving temporary urgency changes requested by SSWD and submit a final memorandum documenting the methodology within 60 days of the date of this Order. The methodology shall include data of monthly volumes of diversions through the Main Canal, deliveries to Camp Far West Irrigation District, and any other releases from the reservoir from 2011 to 2023, as well as a description of how allocations to SSWD customers are established during years SSWD participates in transfers. If the Deputy Director finds the methodology deficient for demonstrating additional flows in the Bear River for the transfer and those deficiencies are not remediated

within a timeframe established by the Deputy Director, SSWD must cease transfer activities approved by this Order. If the approved methodology shows that the amounts proposed for the transfer are not being made available in the Bear River downstream of SSWD, the Deputy Director may order additional releases or bypasses of flow from the Reservoir and Camp Far West Diversion Dam during the transfer period, up to the amount of the approved transfer and consistent with an accounting methodology established by the Deputy Director.

10. SSWD shall provide a report to the Deputy Director by February 1, 2024 describing its refill of the transferred amount of water pursuant to this Order. For periods of refill or refill impacts, including any releases made by SSWD to address a refill impact. The report shall include the daily values for these periods and shall be referred to as the "2023-2024 water transfer report," and be included in the SSWD's annual Report of Licensee as an attachment. If reservoir refill or releases for refill impacts are not complete by February 1, 2024, subsequent reports shall be attached to SSWD's annual Report of Licensee and be submitted by February 1 of each year until completion of refill. The 2023-2024 water transfer report shall include a discussion of any measures and/or methods taken to ensure that releases made to satisfy and be consistent with the refill criteria pursuant to Condition 7 were conducted in a manner that did not injure any legal user of water and did not unreasonably affect fish, wildlife, or other instream beneficial uses.
11. Transfer flows shall be up to 15 cubic feet per second. SSWD shall provide a proposed transfer schedule to the California Department of Fish and Wildlife (CDFW) for review within 15 days following the issuance of this Order. Additionally, SSWD shall notify CDFW when the Reservoir begins to spill and the transfer stops or if the transfer continued through March 2024.
12. SSWD shall submit information regarding this transfer into DWR's Water Transfers Information Management System within 60 days of the date of this Order.
13. Pursuant to Water Code sections 100 and 275 and the common law public trust doctrine, all rights and privileges under this transfer and temporary change Order, including method of diversion, method of use, and quantity of water diverted, are subject to the continuing authority of the State Water Board in accordance with law and in the interest of the public welfare to protect public trust uses and to prevent waste, unreasonable use, unreasonable method of use or unreasonable method of diversion of said water. The continuing authority of the State Water Board also may be exercised by imposing specific requirements over and above those contained in this Order to minimize waste of water and to meet reasonable water requirements without unreasonable draft on the source.

14. This Order does not authorize any act which results in the taking of a candidate, threatened or endangered species or any act which is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish & G. Code, § 2050 et seq.) or the federal Endangered Species Act (16 U.S.C. § 1531 et seq.). If a “take” will result from any act authorized under this Order, right holder shall obtain any authorization for an incidental take prior to commencing the transfer of water. Right holder shall be responsible for meeting all requirements of the applicable Endangered Species Act for the temporary transfer authorized under this Order.
15. The State Water Board reserves jurisdiction to supervise the transfer, exchange, and use of water under this Order, and to coordinate or modify terms and conditions, for the protection of vested rights, fish, wildlife, instream beneficial uses, and the public interest as future conditions or new information may warrant.

STATE WATER RESOURCES CONTROL BOARD

ORIGINAL SIGNED BY:

*Erik Ekdahl, Deputy Director
Division of Water Rights*

Dated: October 5, 2023