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March 31, 2021

Joaquin Esquivel, Chair
Members of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Via E-mail

RE: Temperature Management and Water Supply

Dear Chair Esquivel and Members of the Board:

The State Water Resources Control Board (Board) is once again in the unenviable position of having to make difficult choices when it comes to the state's water supply. With California's weather cycle of dry to wet, and back again, the uncertainty we face is not unexpected. And there is no question that the effects of this year's dry conditions will touch everyone and everything that depends on water.

The decisions the Board will make have the potential for measurable impacts on the ecosystem, agriculture, jobs, disadvantaged communities, and the economy. Protecting water for fish is important. Providing water for farming is important. Protecting water for our rural, suburban, and urban communities is important. Assuring that Californians have jobs and the economic activity of the state are important. The decisions that affect all of these priorities must be balanced, based on sound science, and not rushed if the information to make them is insufficient.

Science-based Decisions

Shasta Reservoir is a critical piece of infrastructure for both water users and the environment. The water thousands of farmers depend on is a product of Shasta Reservoir. The reservoir is also important for fish. Managing Shasta's supplies through a temperature management plan with the Bureau of Reclamation (Reclamation) and water quality control plan with the Department of Water Resources (DWR) is a balancing act that the Board undertakes every year.

Various interest groups have asked the Board to require Reclamation and DWR to submit alternate operations plans for temperature management, requests that seem premature this early in the year. There has not yet been sufficient time for water temperatures in Shasta Reservoir to stratify. Without accurate temperature data throughout the reservoir's profile, it is impossible to adopt a meaningful temperature management plan.

Allowing a moderate amount of time to pass and relying on the April Forecast should provide the additional data on what the water year ultimately looks like and how to address the balance of competing needs.

Drought Impacts

Once again, California is on the precipice of a drought with impacts that will likely affect all water users. Farmers in various parts of the state are already experiencing allocation reductions of up to 95 percent with uncertainty in some cases that any water will be delivered at all. Fields scheduled to grow processing tomatoes, melons, fresh peppers, cotton, sweet corn, and others,

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will end up not being planted because of the dismal water allocations farmers already face. In addition, water costs have already been seen spiking to \$1,000 to \$1,200 per acre-foot and may continue to rise during the year, affecting tens of thousands of acres of permanent crops that may not have an allocation sufficient to meet agronomic needs between now and harvest in the fall.

Reduced water supplies not only affect farmers, many others throughout the food production chain will see jobs reduced or eliminated because there is insufficient water to support the farms on which their jobs depend. Disadvantaged communities are often the first to suffer when water supplies are short, particularly in the Central Valley. Water shortages are an undeniable health risk, and when the water goes, jobs and quality of life follow.

Agriculture's Commitment to Sustainability

Continuous investments in water use efficiency technology by California farmers has helped increase production while at the same time, demand for agricultural water has declined. Between 1999 and 2019 the water used to grow processing tomatoes has declined by 28 percent while production has increased by 38 percent. According to the Almond Board of California, almond farmers over the past two decades have reduced their water footprint by 33 percent and by 2025 are committed to reduce water demands by another 20 percent. These examples and many other like them are not possible, and are even unaffordable, if sufficient water supplies are not available to justify the investments in technology and irrigation infrastructure.

For more than 20 years, farmers have invested in projects that improve habitat conditions for fish and enhance their ability to thrive during their journey from Northern California to the Pacific Ocean. In 2000, Glenn-Colusa Irrigation District installed a state-of-the-art, \$76 million flat plate fish screen at their Hamilton City pump station.

In 2014, as part of ongoing efforts to protect fisheries, a unique partnership developed to design and build the Painter's Riffle Anadromous Fish Habitat Enhancement Project to enhance salmon habitat. The restoration project was designed to reopen Painter's Riffle, a historic salmonid spawning side channel on the Upper Sacramento River.

In 2019, the Sacramento River Settlement Contractors (SRSC) announced the start of the Market Street Bridge Gravel Injection project in Redding to enhance and restore salmon spawning habitat. The Market Street project is another example of the SRSC commitment to preserving and improving fish habitat in the region.

Preparing for Uncertainty

Water operations in California do not exist in a vacuum. Public water agencies serving farms, urban and suburban users, and wildlife refuges, invest heavily in projects that will safely capture and store more water in wet times for use when it's dry. They have developed diversified portfolios where possible, aggressively conserve supplies under their management, and strive to invest in ecosystem projects that enhance the health and resiliency of the state's wildlife and wild lands.

These and many other projects are an indication of the commitment farmers, working in concert with public water agencies and the conservation community, have made toward a sustainable future for California's natural resources and its agricultural heritage.

Water Management is Improving

In 2020, in a letter to SWRCB Executive Director, Eileen Sobek, the SRSC expressed its commitment to temperature management on the Sacramento River and supported an updated

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temperature management plan by the Bureau of Reclamation. However, that commitment was made possible by a more flexible approach to managing Shasta supplies in a way that provided more certainty to farmers while still assuring adequate cold water was available for salmon. A requirement this year that Reclamation submit alternative operations plans and evaluating actions, including reducing water supply allocations to the Sacramento River Settlement Contractors is premature, based on potential hydrological changes that could affect those outcomes.

More recently, in a March 30 letter to State Water Board members, a coalition of public water agencies managing water supplies under CVP contracts highlighted improvements in Reclamation's temperature monitoring and modeling capabilities, and that Reclamation continues work on a new model as set forth in the 2019 Biological Opinion. State and federal agency staff are working together to provide valuable input on Reclamation's temperature management plan, with an oversight team that includes the State Water Board to resolve any disagreements that may arise from the process. And Reclamation remains committed to greater transparency by posting daily temperature information on the Central Valley Operations web site.

Farmers have always stepped up to invest in on-farm and district-level water use efficiency projects. They have completed some of the most innovative and effective ecosystem projects to improve conditions for fish and other wildlife throughout California. And they continue to be committed to doing their utmost to grow safe, healthful, and affordable food and fiber products, create jobs, support communities, and protect the environment to the best of their ability.

We appreciate this opportunity to express our concerns to the Board and look forward to a collaborative process to address this year's water supply challenges. The Board must wait for the data to support its decisions and not create a situation where an overly conservative approach to this year's water supply creates a high-cost, destructive effect on the state's jobs and economy.

Sincerely,



Mike Wade
Executive Director

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