Dear Chair Esquivel and Members of the Board:

We urge the State Water Resources Control Board (State Water Board) to withdraw its controversial water quality certification for the Yuba River Development Project. The withdrawal of the certification would help advance many positive and collaborative efforts underway in the Sacramento River Basin to manage and convey water for multiple beneficial uses, which is essential to California’s economy during these challenging times and will help the Yuba Water Agency serve disadvantaged communities, farms, fish, wildlife, and recreation.

More specifically, the withdrawal of the certification would enable Yuba Water Agency to:

- withdraw its legal actions challenging the certification.
- participate in Governor Newsom’s Voluntary Agreement program to provide collaborative science, funding, new habitat and increased environmental flows for the Sacramento and San Joaquin River watersheds and Delta to implement an update of the Bay-Delta Plan.
- advance ridgetop to river mouth water management in the Yuba River Basin that includes headwaters and forest health management to minimize wildfires; floodplain reactivation for public safety and fish and wildlife values; and sustainable groundwater management. These opportunities are described in more detail in “How Water Management Investments Improve the Environment in Northern California.”
- continue the Yuba River Accord water transfer program, which is an invaluable source of supplemental water supplies for the environment and municipal water suppliers and farms and ranches throughout California, especially during California’s chronic drought periods.
- work collaboratively with the State Water Board (including Board Members) to address water quality issues the State Water Board feels will not be adequately addressed in the pending FERC licensing process.

Conversely, moving forward with the certification could require significant changes to the operation of the Yuba Project because the certification delegates broad and seemingly unfettered authority to State Water Board staff to compel Yuba Water Agency to change its operations. That would impair the Yuba Water Agency’s ability to manage water resources for all of these important programs and beneficial uses, plus it will exacerbate the unnecessary acrimony that has emerged through this certification process.
Importantly, the withdrawal of the certification will provide an opportunity for the State Water Board to engage effectively on the terms of a new FERC license for the Yuba Project and it will not prejudice the State Water Board’s legal action concerning FERC’s orders concerning waiver of 401 authority.

In this light, we urge the State Water Board to withdraw its certification and commit to work collaboratively with the Yuba Water Agency to address water quality issues that the State Water Board feels have not been adequately addressed in the pending FERC licensing process.

Sincerely yours,

David J. Guy
President
Water suppliers in the Sacramento River basin are working closely with federal and state agencies and conservation and community organizations to improve their operations and modernize infrastructure. Rural and urban organizations have joined together as the North State Water Alliance (Alliance) to manage water resources for future generations. The north state region is home to over three million people and California’s state Capitol.

The American, Feather, Yuba and Sacramento rivers provide water for cities and urban areas, rural communities, farms and ranches, fish and wildlife and recreation benefits. It is critically important to guarantee reliable and high-quality water for a strong business climate, ready workforce, high quality of life, healthy environment and vibrant communities.
North State Water Alliance members have unique opportunities to use natural infrastructure to better manage our aquifers, forests and floodplains.

Healthy Forests Have Multiple Benefits

Forests and meadows in the Sierra Nevada, Coastal Range and Cascade Mountains are primary water sources for the mountain and foothill communities, most of the Sacramento River basin and throughout California. Healthy headwaters:
- increase water supply reliability.
- improve water quality.
- reduce impacts from catastrophic wildfires.
- increase renewable energy supplies.
- enhance habitat.
- improve response to climate change and extreme weather.

Responsible and active forest management is a foundational element for watershed uses. Examples include:
- Upper Mokelumne River Watershed Authority Master Stewardship Agreement
- Placer County Water Agency’s French Meadows Forest Restoration Program
- Yuba Water Agency’s watershed restoration activities through Forest Resilience Bonds

Reactivating Floodplains Protects Public Safety and Ecosystems

The Sacramento River basin is fertile ground to reactivate our floodplains, which can enhance river ecosystems and public safety during flood events. Through practical experience, flood and water resources managers, working with conservation partners, have developed the best available science to re-activate floodplains.

Through dynamic conservation strategies, partners collaborate to improve California’s ecosystems and water systems to:
- sustain the return of migratory birds along the Pacific Flyway.
- revitalize river food webs to support recovery of salmon and other fish populations.
- recharge groundwater aquifers.
- improve flood protection from increasing storm severity and a changing climate.

Groundwater Recharge Improves Dry-Year Benefits

Alliance members are developing natural infrastructure for active groundwater management and additional aquifer recharge. The Sacramento Regional Water Bank is an innovative groundwater storage program to store water in the underlying basin during wet periods for use during dry periods now and in the future.

The Sacramento region’s unique, natural infrastructure is ideal for the Water Bank. We are situated at the confluence of the Sacramento and American rivers near Folsom Reservoir and the North American and South American river sub-basins.

The Water Bank and other programs actively recharge aquifers throughout the basin. Using a multi-benefit approach helps enhance climate resiliency, support environmental needs, provide improved water management flexibility and other benefits.
Alliance members support new and improved 21st Century infrastructure to ensure climate resiliency and better prepare our region for floods, fires and droughts.

**Sites Reservoir Will Enhance Dry-Year Supply**

Climate change is forecasted to drastically reduce snowpack and alter precipitation patterns. Water managers see a strong need for 21st century investments like Sites Reservoir to enhance:

- water management flexibility
- climate resiliency
- the ecosystem
- future dry-year supply

Sites new style of infrastructure as an off-stream, regulating reservoir will store water by capturing it during high runoff periods and releasing it when needed. With its location upstream of the Delta and near the Sacramento River, water from Sites will support multiple benefits in the Sacramento River basin, the Delta and the rest of California. This includes helping California’s farms, businesses and cities have a reliable water supply.

**RiverArc Will Support Healthy Riverine Habitat**

Residents in the Sacramento area receive most their water from the American River. Water purveyors in the region are looking “into other water supply sources to protect fish habitat in the scenic American River and provide alternate supply.

RiverArc will help Sacramento water providers follow through on water supply agreements, meet current and future drinking water demands, protect fish species and provide climate change resiliency. Using existing, modern fish screens with excess capacity, RiverArc will require two new facilities: a water treatment plant and pipelines to move water through the system.

**Advancing Voluntary Agreements**

The Alliance supports voluntary agreements as a better alternative to regulatory processes such as the State Water Board’s Water Quality Control Plan Update. Alliance water providers are coordinating 15-year agreements with:

- California Natural Resources Agency
- U.S. Bureau of Reclamation
- State and Federal water contractors

Natural infrastructure and Sites Reservoir are important elements of voluntary agreements.

The comprehensive proposal helps meet water quality objectives in the State Board’s Bay-Delta Plan. This is a more collaborative alternative to the traditional adversarial State Water Board hearing process. The agreements include a portfolio of instream flows, reactivated floodplains and habitat restoration measures to benefit fish and wildlife.
Northern California Plans for Their Water Future

CALIFORNIA’S NORTH STATE is a unique place to live, work and raise a family. Our region is on the leading edge of ecological and economical sustainability. The Sacramento River basin is world-renowned for its natural abundance of productive farmlands, wildlife refuges and managed wetlands, and rivers that support and feed fisheries and natural habitats.

The basin nourishes and sustains agriculture fields, fish and wildlife habitats, recreation and a high quality of life. Through planning and multi-use projects, North State Water Alliance members will provide water for California’s future success and prosperity.

David J. Guy
President
dguy@norcalwater.org
916-442-8333

John Kingsbury
Executive Director
executivedirector.mcwra11@gmail.com
530-957-7879

Jim Peifer
Executive Director
jpeifer@rwah2o.org
916-967-7692

Photo: Bob D’Elia, PCWA