



*Yuba County, California*



December 2, 2020

Members of the State Water Resources Control Board  
c/o Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000

Re: Comments – Limited Order for Yuba River Development Project

Dear Chair Esquivel, Vice Chair D'Adamo and Board Members Doduc, Firestone and Maguire:

I write to you today on behalf of the Board of Directors of Reclamation District 784 regarding the State Water Resources Control Board's (State Board) water quality certification for Yuba Water Agency's license for the Yuba River Development Project.

This water quality certification (certification) was issued by the State Board's staff in July of this year. Our Board of Directors is concerned this Certification, through several of its 50 different conditions, would create water shortages throughout Yuba County, for farmers, ranchers, and potentially even some homeowners. It would also dramatically reduce the value of Yuba Water Agency's hydropower generation, and their annual revenue. This is important because Yuba Water Agency is leading our region's flood risk reduction efforts. Their revenue often provides an important local cost-share so we can leverage state and federal funding for our levee repairs and improvements. The loss of Yuba Water Agency's revenue would significantly impair our public safety mission, potentially placing lives at risk.

Reclamation District 784 (RD 784) was established over 112 years ago and operates under the authority of California's Central Valley Flood Protection Board and the Department of Water Resources. RD 784 covers approximately 40,676 acres including 33.59 miles of levees, more than 60 miles of internal drainage canals, and ten pumping stations. District boundaries are: North - Yuba River, South - Bear River, West- Feather River, East - Western Pacific Interceptor Canal. The district encompasses approximately 2,000 commercial buildings and more than 12,500 residences.

Maintaining levees within our jurisdiction is our mission. Fortunately, Yuba Water provides financial support for work within our District. For example, Yuba Water provided the essential \$46 million cost-share for the construction of the Feather River setback levee, a nearly 6-mile-long setback that provides more than a 200-year level of protection from flood events for Yuba County communities throughout RD 784. This setback levee also established more than 1,300 acres of floodplain habitat along the Feather River, benefitting numerous fish and wildlife species. Yuba Water is continuing to cost share a number of levee repairs, improvements, and other public safety work in our region. One example is their planned \$225 million secondary spillway at New Bullards Bar Dam. This project when it is complete will improve public safety for RD 784 and other communities in Yuba, Sutter, and even Sacramento counties.

Because Yuba Water is the only practical local financial option to support flood risk reduction in our community, any loss of the value of their hydropower generation, and thus their revenue, threatens our mission. The reality is that state and federal funding sources are increasingly difficult to secure, and so, local sources are becoming more important.

We encourage the State Board to withdraw and vacate the certification. Doing so will enable all of us to responsibly continue our mission to protect people and property from flooding while the State Board and Yuba Water work together on a plan to address their responsibilities under state and federal law for the operation of their facilities in the Yuba River watershed.

Sincerely,



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