



June 10, 2021

Via Electronic Mail
Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814
commentletters@waterboards.ca.gov

RUSSELL KAGEHIRO
President
Division IV

TIM MAGGIORE
Vice President
Division III

LARRY ENOS, JR.
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MARK MAGGIORE
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Division II

CHARLES TUSO
Director
Division V

TOM PEREIRA
Director
Division VI

JACK ALVAREZ
Director
Division VII

RICK GILMORE
General Manager
Secretary

RE: 6/15/2021 BOARD MEETING – ITEM 5 : Consideration of a proposed Resolution to adopt Emergency Regulations to address water shortages in the Russian River Watershed

Dear Ms. Townsend,

Byron-Bethany Irrigation District (BBID) appreciates the opportunity to submit comments on the above-referenced agenda items.

Among other defects, the revised methodology does not utilize the best available data. Instead of using current data, the methodology estimates water availability during 2021 using demand data from 2018 and 2019. This is not the best available data. Permittees and licensees submitted 2020 reports. Thus, the analysis should be updated with 2020 data for permittees and licensees. In addition, many large diverters measure diversions in real time, including major reservoir operators. Thus, when available, the analysis should be updated with real-time diversion information. While the available real-time data are provisional, contemporaneous data are more accurate than data from a different year.

We also request that the State Water Resources Control Board (State Water Board) acknowledge that other watersheds may have different characteristics, and the quantity and quality of available data may differ between watersheds. In addition, stakeholders in other watersheds may not have had the opportunity to review and comment upon the application of the proposed methodology in the Russian River Watershed. For these reasons, we request that the State Water Board clarify that the methodology proposed for the Russian River Watershed will not be precedential for other watersheds within the state.

Jeanine Townsend, State Water Resources Control Board

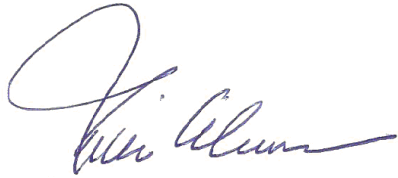
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Resolution to adopt Emergency Regulations to address water shortages
in the Russian River Watershed

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Should you have any questions about this comment, please feel free to contact
me

Very truly yours,

A handwritten signature in blue ink, appearing to read "Rick Gilmore". The signature is fluid and cursive, with a large initial "R" and "G".

BYRON BETHANY IRRIGATION DISTRICT

Rick Gilmore

General Manager