Shasta River Water Association, Inc.

P.O. Box 467 Grenada, CA 96038 530-459-5788

# Directors: Rick Lemos, Steve Lorenzini, Rick Brooks, Jim Scala & Justin Sandahl

August 17, 2022

Erik Ekdahl, Deputy Director  
Division of Water Rights  
State Water Resource Control Board  
P.O. Box 2000  
Sacramento, CA 95812-2000

Re: Water Curtailment - Shasta River August 2, 2022

Dear Mr. Ekdahl,

The Shasta River Water Association has chosen to follow the suggested curtailment of 15% on the Shasta River. We will start pumping to supply water to livestock as the weather is over 90 degrees per the suggestion. We will also follow the suggestion to fill ponds for fire suppression and attempt to water the tree base to reduce fire hazards to the community and our families.

The Curtailment Order states water must be provided for livestock if temperatures are above 90°F. Montague, California has experienced 42 days above 90°F thus far in 2022. Simply put, the lack of water is drying up livestock feed and forcing livestock to be sold because they can no longer withstand the poor conditions. Producers are often experiencing huge losses.

The Shasta River Water Association has over 12 ponds. The water from these ponds, can and has been utilized as fire suppression. Helicopters have dipped into its ponds, not to mention those in the Grenada Irrigation District, Big Springs Irrigation District and Montague Water Conservation District. The Curtailment has dried the Shasta Valley to the point of endangerment to health and life of the public and residents who live here, with apparent disregard to the livestock and pet health within this watershed.

The Shasta River Water Association looks forward to working with the numerous agencies in effort to protect the health of the river. At this time, we are choosing to protect the health of livestock, wildlife, and families.

Exceptions to Curtailment (allowances to continue limited diversions) of diversions that may continue, even after receiving a curtailment order are if the appropriate form(s) is submitted to the State Water Board. The exceptions are:

• Non-consumptive Diversions. This exception applies if the diversion is not consumptive, meaning that it does not use up water or change the time the water is available to others (i.e., diversions do not decrease stream flows).

• Minimum Human Health and Safety Diversions. This exception applies if the diversion is the only water source for human health and safety purposes: such as drinking, cooking, washing. Meeting the state’s critical infrastructure needs. Please note that diversions for firefighting may continue under this exception.

• Minimum Livestock Watering Diversions. This exception applies if the diversion is the only source for minimum livestock watering needs. Per page 4, Shasta River Water Association should be pumping for Livestock Watering Diversions and maintaining well water for Human Health and Safety.

Why are we not following the guidelines you proposed? (iii) For the Shasta River: The proposal provides at least: 1. A net reduction of water use of 15 percent throughout the irrigation season (March 1 – November 1), as compared to the prior irrigation season; and 2. A monthly use reduction shall be based on a comparison to the 2020, 2021, or 2022 irrigation season, and may be demonstrated by evidence that provides a reasonable assurance that the change in farming practice or other action results in at least the relevant proportionate reduction in water use. 875.3 Minimum Diversions for Livestock Watering.

Thank you,

Shasta River Water Association