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JAMES M. BOYD, JR., Of Counsel

May 5, 2014

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P. O. Box 100
Sacramento, California 95812-0100

Re: Comment Letter – 05/20/14 Board Meeting: Millview Revocation Hearing

Dear Ms. Townsend:

This firm represents the Sonoma County Water Agency (“SCWA”). This letter provides SCWA’s comments on the April 22 draft order in the above matter.

As discussed on page 3 of the draft order, SCWA participated in the April 2, 2013 SWRCB hearing and related proceedings on the proposed revocation of water right License 5763. During those proceedings, SCWA asked the SWRCB to issue an order revoking License 5763 because of the long history of non-use under the license, and because Millview County Water District’s proposed new diversions under this license could require SCWA to release additional water from Lake Mendocino storage to maintain required minimum streamflows in the Russian River. These additional releases of stored water would reduce Lake Mendocino storage in the summer and fall, which in turn could adversely impact SCWA’s ability to maintain adequate streamflows and water temperatures for Russian River fisheries and water users.

For these reasons, SCWA supports the SWRCB’s adoption of the proposed order, with two minor edits. First, in footnote 7 on page 10, SCWA requests that the following sentence be added at the end of the footnote:

While the Report is hearsay, it is properly admitted under Government Code section 11513, subdivision (d) to supplement or explain other evidence admitted during the hearing related to the water of water at the former Masonite Plant.

Second, in the carryover paragraph on page 16, SCWA requests that the last sentence of this paragraph be edited by adding the following additional text:

Ms. Jeanine Townsend

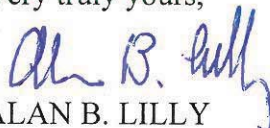
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Because License 5763 has a year-round diversion season, such diversions could occur during any month of the year (subject to the availability of water that could be diverted under this license).

SCWA appreciates the opportunity to provide these comments on the draft order. I will attend the May 20 SWRCB meeting and will be happy to answer any questions about this letter then.

Very truly yours,



ALAN B. LILLY

ABL:tmo