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March 1, 2021

VIA E-MAIL

Mr. Alan B. Lilly
Presiding Hearing Officer
Administrative Hearings Office
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Comment Letter – Draft Proposed Order Dated January 22, 2021

Dear Mr. Lilly:

This letter transmits the comments of Petitioners, Sacramento County and Sacramento County Water Agency, on the Draft Proposed Order on the Petitions for Change for Licenses 1062 and 4060, dated January 22, 2021. The Draft Proposed Order deletes the existing purpose of use, places of use, and points of diversion for Licenses 1062 and 4060. (Draft Proposed Order, p. 57.) Petitioners requested that the State Water Resources Control Board add municipal and industrial use as a purpose of use, the Freeport Regional Water Project as a point of diversion, and Sacramento County Water Agency's Zone 40 as a place of use to Licenses 1062 and 4060. (Exhs. Sac County – 45-46, 65-66.) With this request, Petitioners intended to retain the existing purpose of use, places of use, and points of diversion for Licenses 1062 and 4060 for potential future uses unrelated to the irrigation of airport-adjacent agriculture. The Draft Proposed Order does not discuss the basis for the deletions and the Protestants did not press this issue, so Petitioners are unclear of the reason for the deletions. Petitioners respectfully request that you revise the Draft Proposed Order by deleting the provisions that delete the existing purpose of use, places of use, and points of diversion for Licenses 1062 and 4060. Petitioners understand that, with any such revisions, the licenses would still be subject to the reduced diversion rates and annual diversion amounts set forth in the Draft Proposed Order.

Very truly yours,

Aaron Ferguson

AAF:rs