



Forest
Service

Pacific Southwest Region

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File Code: 2540
Date: DEC 17 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Ms. Townsend:

The US Forest Service, Pacific Southwest Region, would like to take this opportunity to submit formal comments to the State Water Resources Control Board (SWRCB) in regards to the Draft Emergency Regulations. The Forest Service is supportive of the SWRCB's effort in drafting and implementing regulations for the monitoring of water right diversions. Much of the State's water resources originate on National Forest System Lands and we are committed to ensuring that water resources are conserved and used in an efficient manner and especially during times of drought.

In order for the Forest Service to comply with the State's proposed draft emergency regulations we request that the SWRCB consider modifying the time allowed to comply with these regulations. Upon initial investigation of the SWRCB water right data base our water rights total more than 2,900. Given the location of the National Forests, their size, topography, remote locations, the total number of water rights that we hold and the limited resources available to the Forest Service (including manpower and funding), we will be uniquely challenged to fully comply in the time frame currently proposed in the draft emergency regulations. Other federal agencies that hold water rights in the state of California may also be challenged in meeting the proposed compliance time frames as well. Specifically, we request that Section 932 Applicability, and Section 936 Request for Additional Time, include reasonable flexibility for Forest Service compliance.

The Forest Service looks forward to working with the SWRCB in implementing emergency regulations that allow us to come into full compliance in a reasonable time frame. If you have any questions please feel free to call Diana Craig, Deputy Director of Ecosystem management at 707-562-8975.

Sincerely,


for RANDY MOORE
Regional Forester Pacific Southwest Region

cc: Deb Whitman, Diana Craig, Gabriel Venegas

