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March 17, 2017

Felicia Marcus, Chair  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

**RE: Comments on Bay-Delta Water Quality Control Plan Revised Draft SED**

Dear Chair Marcus,

The California Farm Water Coalition wishes to express its support for workable, holistic, collaborative solutions to meet the challenges facing Sacramento-San Joaquin Bay-Delta water quality- solutions that are not currently achievable through the staff-proposed Bay Delta Plan Substitute Environmental Document (SED). We continue to believe that policies supporting outcomes-oriented actions based in objective science and pursued in a spirit of collaboration with local and State partners will lead to more robust, adaptive, and durable solutions for all stakeholders.

During five hearings in Sacramento and the San Joaquin Valley during the SED public comment period, Board Members heard from community leaders, water district professionals, business and finance experts, engineers, biologists, economists, farmers and members of affected communities about the numerous shortcomings found in the current proposal. The hearings teemed with people concerned about the threat to their community, homes, and livelihoods. These voices and faces cannot be ignored.

Flow-centric approaches pursued in other places have not only proven to be inefficient and costly, but they often produce adverse impacts not foreseen by those advancing them. One example is the Murray Darling Basin Plan, pursued by Australia in response to an unusually prolonged drought and impacted river systems. While this flow-oriented approach has reallocated water from farms and communities to environmental uses, these uses have yet to deliver the environmental benefits that they sought to achieve. The adoption of a flow-based approach has proven devastating to once-productive communities such as Wee Waa, Warren and Collarenebri, now withering for lack of water and the farm-related jobs it supports. Unemployment, farm foreclosures, business closures and strained social services are the ongoing legacy of this approach.

With elusive benefits but undeniable cost, water managers in Australia are now beginning to consider implementing “complementary measures,” non-flow actions that can improve the efficacy and efficiency of water dedicated to environmental purposes. Complementary measures closely align to the numerous non-flow measures, such as habitat restoration, predator control, and release timing that experts here have recommended the State pursue in meeting the species and ecosystems goals outlined in the proposed SED. The SED advocates for a number of specific benefits of flow for salmonids, such as predation, fish growth, reproduction, and food production, all of which these other non-flow management strategies could achieve.

The Board should abandon the current narrow focus in the SED staff proposal and join a team effort to comprehensively address the complex network of factors beyond flow that can help to meet our changing needs. Our state and its waterways are forever and irreversibly changed from their natural condition. Adopting management strategies that promote responsive, nimble actions, based on best-available science and superior monitoring will produce better results for all users and reduce wasteful loss of that water.

**Felicia Marcus**

March 17, 2017

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Ensuring that all water is put to work to the fullest extent possible requires that measures taken to support one use do so with demonstrable management efficiencies. When one use comes at the cost of another, some effort must be taken to ensure that water is truly being put to work. Human water uses are held to not only a standard of utility, but also mandates on planning, application efficiency, use and allocation measurement. Quantifying the efficiency of environmental uses, such as fishery benefits, would gain from the completion of water management planning and implementation of quantifiable benefit-driven efficient water management practices.

We urge the Board to discontinue pursuit of this misguided, unilateral action and instead focus on helping to develop collaborative, comprehensive approaches to improve water resources for all stakeholders, as outlined in relevant legislative directives.

The coequal goals of the Delta Reform Act require that California provide a more reliable water supply; a goal the proposed plan fails to do. Instead the proposed plan destabilizes not only the water supply of a region, but the communities and lives built on that supply. Implementing an approach to achieving these coequal goals that protect the people and the communities they have built will require work, but their lives are worth the effort.

We strongly urge the Board adopt a course of action that also seeks to foster success, not ensure failure in local efforts to achieve sustainable use of groundwater as required by the Sustainable Groundwater Management Act. Ensuring that sufficient surface water is available to avoid expanding groundwater overdraft into the basins affected prudently avoids the subsidence and overdraft issues caused by surface water delivery curtailment in other parts of the state.

California's water suppliers, cities, counties and other local agencies have an abundance of intelligent and innovative personnel. Reaching out to local experts in these agencies helps harness local expertise the State does not have. Working together as a partner with other State and local agencies is certain to more quickly yield equitable, functional solutions.

We look forward to a positive response to the numerous suggestions, plans and offers on the table by local public water agencies that have already demonstrated the kind of success the Board seeks in its Draft Water Quality Control Plan. Working together in a collaborative manner rather than seeking solutions through a regulatory approach will help sustain California's rural economy and restore the important ecosystem resources that are important to all of us.

Sincerely,



Executive Director