



July 24, 2018

Ms. Jeanine Townsend  
Clerk of the Board  
State Water Resources Control Board  
101 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**Subject: Comment Letter – Revisions to Proposed Bay-Delta Plan Amendments**

Dear Ms. Townsend,

The purpose of this letter is to express our concerns regarding the Proposed Final Amendments to Appendix K of the *Revised Water Quality Control Plan*, of the Final Substitute Environmental Document (SED). Based upon our review, it appears that the State Water Board is failing to consider constructive recommendations from public water agencies, agricultural and urban water users, and other stakeholders on a suite of more effective and contemporary ways to improve fisheries on the Lower San Joaquin River and instead is proposing an unimpaired flow construct that is outdated in its approach and contradictory with the state's policy of supporting co-equal goals in the Bay-Delta.

The Southern California Water Coalition (SCWC), representing public and private entities throughout six counties in urban Southern California, views this decision as significant to all of California, not just the San Joaquin River watershed, and as precedent setting for your Phase 2 Sacramento River and Delta decisions. Placing all the regulatory emphasis upon reestablishing unimpaired flows, with the acknowledged hope that other stakeholders will independently step-up and make ecological improvements, habitat restoration and provide pulse flows or other functional flows from a more limited water supply, is unlikely to be a successful strategy.

The Proposed Final Amendments prioritize one beneficial use, unimpaired flows, over all others. That is inconsistent with state policy promoting co-equal goals of protecting, restoring and enhancing the Delta ecosystem and providing more reliable water supplies for California. That approach also conflicts with the Brown Administration's goal of seeking transformative change based upon new science and re-thinking old assumptions in the Comprehensive Water Action Plan. It ignores climate change and takes a disproportionate amount of water from surface and groundwater storage. Rather than





an essential balancing of beneficial uses in a warming and drying climate, it attempts to restore flows at levels of decades past regardless of impacts upon other valid beneficial uses.

SCWC supports continued negotiations with water rights holders on the San Joaquin River to achieve a more modern functional flow approach to improve fish habitat and passage that better balances beneficial uses.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Wilson', is positioned below the word 'Sincerely,'.

Charles Wilson  
Executive Director

Via Email: [LSJR-SD-Comments@waterboards.ca.gov](mailto:LSJR-SD-Comments@waterboards.ca.gov)



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**From:** Southern California Water Coalition (SCWC) <info@socalwater.org>  
**Sent:** Wednesday, July 25, 2018 11:48 AM  
**To:** LSJR-SD-Comments@waterboards.ca.gov; WQCP1Comments  
**Cc:** smelbostad@fionahuttonassoc.com  
**Subject:** Comment Letter: SWRCB's Bay Delta Plan  
**Attachments:** SCWC\_BayDeltaCommentLetter\_7.24.18.pdf

Hello,

Please see attached for SCWC's formal letter of concern regarding SWRCB's recent Bay Delta Plan.

If you have any questions, please contact Sarah Melbostad at [smelbostad@fionahuttonassoc.com](mailto:smelbostad@fionahuttonassoc.com).

Thank You