

**Martin E. Zvirbulis**  
Secretary / General Manager/CEO

March 15, 2017

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814-0100

Public Comment  
2016 Bay-Delta Plan Amendment & SED  
Deadline: 3/17/17 12:00 noon

Sent via Email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Comment Letter – 2016 Bay-Delta Plan Amendment & SED**



Dear Ms. Townsend:

The Cucamonga Valley Water District thanks you for the opportunity to provide additional comments on the Draft Science Report for Sacramento River and Delta Flow Requirements.

The draft flow objectives go against the hard work and investments made by water agencies throughout the state such as CVWD who have work tirelessly over the past decade to change our customer's behavior to use water more efficiently and that every drop of water is important. This type of behavior is inconsistent with the message of being in a drought and undermines our credibility with our customers.

The State Water Board's "unimpaired flows" approach for the San Joaquin River and its tributaries is not the path to achieve the desired ecological outcomes. It is inconsistent with established state policies, such as the California Water Action Plan, the coequal goals defined in the Delta Reform Act of 2009, the Sustainable Groundwater Management Act of 2014, and the Human Right to Water Act.

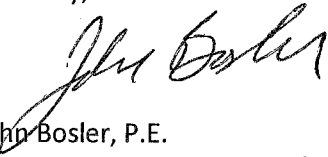
This proposal would undermine investments in storage, adversely impact the drinking water quality of disadvantaged communities, increase groundwater overdraft in a part of the state where groundwater basins are already out of balance, and put large acreages of agricultural land out of production.

The State Water Board should set aside the percent of unimpaired flows approach and heed Gov. Jerry Brown's call for negotiated agreements. Such agreements have been demonstrably successful in achieving desired ecological outcomes while maintaining water supply reliability.

We encourage the State Water Board to embrace a collaborative process to develop water quality objectives that incorporates the best available science, utilizes comprehensive solutions that address multiple variables, aligns with established state policies, considers economic impacts, and ensures that Bay-Delta Plan decisions enable rather than obstruct implementation of the California Water Action Plan.

Thank you for your consideration and for the open dialogue.

Sincerely,

A handwritten signature in black ink, appearing to read "John Bosler". The signature is written in a cursive style with a large initial "J".

John Bosler, P.E.  
Assistant General Manager/COO

Cc: Association of California Water Agencies