



GARY SOISETH  
MAYOR



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July 24, 2018

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

Re: Comment Letter - 2016 Bay-Delta Plan Amendments and Final Substitute Environmental Document (SED)

Dear Ms. Townsend:

The City of Turlock has serious concerns regarding the State Water Board's update to the Bay/Delta plan. The State Water Board's proposal continues to require 40 percent of unimpaired flows for February through June, with an allowed adaptive range between 30 to 50 percent, for the Stanislaus, Tuolumne and Merced Rivers through to the San Joaquin River. The proposed flow objectives are intended to increase the required flows left in rivers for the protection of fish and wildlife but would significantly reduce water available to water users in the Lower San Joaquin River Watershed.

In March 2017, the City submitted comments addressing a number of technical and legal issues surrounding the State Water Board's proposal. Despite having well over a year to adequately address thousands of public comments from the San Joaquin region, the State Water Resources Control Board continues to double down on its proposal to mandate 40 percent of unimpaired flows along the Tuolumne, Merced and Stanislaus rivers from February 1 to June 30 annually.

The City of Turlock has made significant investments to solve our water supply problems by increased conservation, increased reuse of water and increased access to new sources of water. The City of Turlock has a population of 72,000 and is entirely dependent upon groundwater for our drinking water supply and we supply our customers with 19 active wells.

Our main employers are food processors, examples of which include, but are not limited to: Foster Farms, California Dairies, Sunnyside Farms, Land of Lakes, Blue Diamond Growers, and SupHerb Farms. These food processors are part of a vast vertically integrated network of growers and processors that put milk, cheese, butter, and turkeys on our dining tables. Other products are exported further boosting our State's and our nation's balance of trade. All of these industries are dependent upon a safe and reliable water supply for their existence.

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Water is the lifeblood of our economy and farmers have made significant investments in community infrastructure, such as recycled water projects, recharging aquifers, and adopting state-of-the-art irrigation practices to conserve this valuable natural resource. One such investment is the North Valley Regional Recycled Water Program (NVRWP), which is a regional solution to water supply and reliability problems caused by a combination of increased limitations on pumping and unprecedented dry conditions. The NVRWP allows the Cities of Turlock and Modesto to provide treated recycled water to the Del Puerto Water District who will in turn distribute that water to the agricultural customers in their service area.

In addition, together with the City of Ceres, the City of Turlock is developing a surface water supply of drinking water in partnership with the Turlock Irrigation District. Preliminary estimates indicate that the Stanislaus Regional Water Authority (SRWA) water treatment project will cost \$273 million. For our two communities this is our single largest infrastructure investment since our communities were incorporated. Despite its significant cost, the Turlock and Ceres City Councils embarked on this forward-thinking and ambitious project because our groundwater supply is diminishing and water quality is declining. The SRWA project is the Cities' best option to provide high quality drinking water to our region and, as an added benefit, improve aquifer recharge by reducing groundwater pumping. Our region needs a surface water supply to comply with increasingly stringent State drinking water standards and the Sustainable Groundwater Management Act (SGMA).

The SED does not provide an adequate or fair analysis of how the proposed regulatory scheme of unimpaired flows achieves a balance of ecosystem restoration on one hand and water supply reliability on the other. The SED clearly recognizes the potential ecological benefits but tends to generalize, downplay and de-emphasize the potential adverse impacts on water supply reliability and sustainability. Importantly, the SED in its latest revision fails to adequately analyze adverse impacts to SGMA implementation.

Unfortunately, the State Water Board's document is dismissive in its treatment of municipal water suppliers like the City of Turlock. The State Water Board's "solutions" to the reduction in surface and groundwater supplies includes augmenting current supplies through purchases and transfers, taking farm land out of production, and increased water conservation. However, the feasibility or practicality of these solutions is not fully fleshed out; therefore, the true impact of the unimpaired flow regime remains very uncertain. Indeed, State Water Board takes a cavalier approach in its attitude towards municipal service providers saying "the Board recognizes that adjusting to reductions in water supplies will be *challenging* for water users as these actions progress [emphasis added]." What if our region cannot rise to the challenge due to our socio-economic disadvantages? Incomprehensively, the burden of complying with the SED falls squarely on the shoulders of some of the most disadvantaged people in California.

The City of Turlock is very concerned that the flow proposals will cause significant harm to our region, our residents, and our businesses without achieving the stated objective. We request that the Board take a more scientific, comprehensive and balanced approach to the declining salmon populations. Furthermore, the State Water Board must seriously consider the human

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impact and groundwater impact of the proposed project and SED on the citizens of the City of Turlock and the entire San Joaquin Valley. We urge the State to conduct a proper analysis of the affects SED will have on the region and we stand willing to participate as a partner to address critical water policy in California and specifically the San Joaquin Valley.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gary Soiseth', with several horizontal strokes extending to the right.

Gary Soiseth  
Mayor

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**From:** Allison Martin <AMartin@turlock.ca.us>  
**Sent:** Wednesday, July 25, 2018 11:56 AM  
**To:** LSJR-SD-Comments@waterboards.ca.gov; WQCP1Comments  
**Cc:** Michael Cooke  
**Subject:** Comment Letter - Revisions to Proposed Bay-Delta Plan Amendments  
**Attachments:** Comment Letter - Revisions to Proposed Bay Delta Plan Amendments.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Morning,

Please see the attached regarding the above subject. Please confirm receipt of this email.

Thank you,

*Allison Martin*  
*Executive Administrative Assistant*

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209-668-4142  
[amartin@turlock.ca.us](mailto:amartin@turlock.ca.us)

