



July 27, 2018

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

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

Dear Chair Marcus:

Please accept these comments on behalf of the San Luis Canal Company. The San Luis Canal Company is one of the four entities known as the San Joaquin River Exchange Contractors. The Exchange Contractors have riparian and Pre-1914 water rights that pre-date the predecessor of the State Water Resources Control Board. The exchange contract between the four entities and the Bureau of Reclamation allowed for the construction of the Friant Unit of the Central Valley Project. That agreement, and other related agreements, has allowed for the irrigation of thousands of fertile acres in the San Joaquin Valley, provided jobs to the region, avoided groundwater overdraft problems, and contributed to a vibrant agricultural economy. Your plan threatens to unravel those agreements, throwing the region into chaos, and resulting in years of litigation.

Your letter dated July 19, 2018, to Ms. Valerie Kincaid of the San Joaquin Tributaries Authority, stated that the stakeholders have had extensive opportunity to review and comment on the SWRCB's Phase 1 proposal. While that may be true, it is abundantly clear that all of our region's comments and recommendations were ignored. Despite having well over a year to adequately address the comments from our region, the State Water Resources Control Board ignored those comments and the value of water to our community and instead spent its resources attempting to bolster a faulty plan and SED.

State Board Chairwoman Felicia Marcus misinformed our communities when she stated that "efforts are underway to design voluntary agreements" (How to move past water wars, save the Delta, Page 7A, July 12). The water agencies in the Central Valley have met with state officials at the negotiating table for more than a year offering science-based, balanced solutions. The Board's recent action further proves that its mind was made up a long time ago, and any claim of negotiating in good faith is a charade.

Despite dozens of meetings, testimony from experts representing public water agencies, cities, farms, school districts and more, as well as mounting scientific proof that their approach is wrong, the State Water Board has failed to acknowledge that its approach is wrong.

The State Water Board's unimpaired flow strategy does nothing to address major stressors in the system, such as the loss of habitat for native species and overwhelming predators that have gained a problematic foothold on the Delta. Rather than set a goal of 40% of the unimpaired flow of Stanislaus, Tuolumne, and Merced rivers, the SWB should instead refocus on what the fish need.

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"A MUTUAL WATER COMPANY SINCE 1913"

River flow is a vital component of fish health, but it is not the only factor and it doesn't mean that an additional abundance of water is needed. That's why scientists who have studied all aspects of potential stressors – predation, water temperature, timing of river flows – agree that a combination of flow and non-flow measures would create the conditions for native fish species to thrive significantly more than the state's flow-centric demand.

We all support a vibrant and healthy San Joaquin River and Delta, but not at the expense of a subset of water users. The State Board should stop ignoring fact-based logic and do the right thing.

Sincerely,



John Wiersma
General Manager
San Luis Canal Company

From: Sahota, Jaspreet@Waterboards <Jaspreet.Sahota@Waterboards.ca.gov>
Sent: Friday, July 27, 2018 3:19 PM
To: LSJR-SD-Comments; WQCP1Comments
Subject: print letter received 07-27-18
Attachments: John_Wiersma.pdf

Categories: Purple Category, Red Category

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