



**Mani Grewal, City Councilmember**  
**City of Modesto**

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July 27, 2018

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814-0100  
E-mail: [LSJR-SD-Comments@waterboards.ca.gov](mailto:LSJR-SD-Comments@waterboards.ca.gov)

RE: Statement from Modesto City Councilman Mani Grewal on the Final Draft Bay-Delta Plan

Chairwoman Marcus and Members of the Board:

Since your draft release in 2012, and the subsequent update in 2016, the Modesto community, and the other cities and towns in San Joaquin, Stanislaus and Merced counties, have diligently attempted to have in depth discussions with your staff and consultants to understand your assumptions and modeling in your assessment of this plan's drinking water and groundwater quality and quantity impacts.

I do not understand how you can spend years and millions of dollars on such a radical change affecting millions of people without understanding, or at least sharing your understanding, of its impacts on people.

There are too many examples to highlight them all here, but I would like to point out one from my own experience as a local city official.

Your report recognizes that the plan will have a "significant but unavoidable" impacts on groundwater resources. You do not even attempt to quantify this impact, despite the fact that you know that most of this area is in critical aquifer status, and that the single greatest source of groundwater recharge is irrigation.

You also ignore this reality in your economic analysis, contending that any loss of irrigation water will be dealt with in the implementation of California's new groundwater law.

The Modesto City Council would not even consider such a major change in policy without full and comprehensive discussions with all the stakeholders. The council could never proceed with a project while knowing that its impacts have been seriously understated or, even worse, dismissed, as not the State's concern.

Yet you would do just that in adopting this report.

Reject this plan!

Don't create economic and environmental havoc premised on a self-admitted faulty analysis of benefits for fisheries.

Your board has not acted in good faith with the local community in this endeavor. You have a last chance to conduct the State's business in transparency and good faith.

Please, start over. It is in California's, and Modesto's interests that you do so.

Modesto, San Joaquin, Stanislaus and Merced counties, our water agencies, and our cities have acted in good faith in this matter. Your board has not.

Let's try again.

Sincerely,

*Mani Grewal*

Modesto City Council  
District 1

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**From:** Megan Rangel Belair <megan.rangel@gmail.com>  
**Sent:** Friday, July 27, 2018 10:52 AM  
**To:** LSJR-SD-Comments@waterboards.ca.gov; WQCP1Comments  
**Subject:** Mani Grewal Bay Delta Update Comment  
**Attachments:** 07 27 18 Grewal Bay Delta Plan Comment.pdf

**Categories:** Red Category

Good morning,

Please find the attached comment on the Final Draft Bay Delta Plan from Modesto City Councilmember Mani Grewal.

Thank you.