



10440 Ashford Street, Rancho Cucamonga, CA 91730-2799
P.O. Box 638, Rancho Cucamonga, CA 91729-0638
(909) 987-2591 Fax (909) 476-8032



Martin E. Zvirbulis
Secretary / General Manager/CEO

December 15, 2016

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

Sent via Email to: 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 comment on the Draft Science Report for Sacramento River and Delta Flow Requirements.

Since 2009, the hallmark of California water policy has been a commitment to the coequal goals of improving both water supply reliability and ecosystem health. Managing for the coequal goals means recognizing that the needs of our economy and our environment are both legitimate. It means taking a balanced approach to policy decisions and regulatory proposals to better meet those needs and reduce conflict. It also means moving away from narrow, single-stressor actions that fail to protect our water supply and species.

Draft flow objectives for the San Joaquin released in November by the State Water Resources Control Board staff raise serious questions about their commitment to a state policy founded on the coequal goals. Requiring up to 50% of unimpaired flow to remain in the river for the purported benefit of fish species, as proposed by State Water Board staff, does not reflect a balanced approach. Nor does it recognize the millions of dollars agencies have invested in fishery science, modeling, habitat restoration and coordinated flow regimes to improve salmon populations and other aquatic resources.

The State Water Board staff's draft plan would deal a severe blow to many communities already struggling with drinking water quality and quantity challenges. It also would make it extremely difficult for local agencies to achieve state-mandated goals under the Sustainable Groundwater Management Act of 2014, both by compelling growers to pump more groundwater and by reducing the amount of surface water available to recharge groundwater basins.

In addition, 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.

James V. Curatalo Jr.
President

Luis Cetina
Vice President

Oscar Gonzalez
Director

Randall James Reed
Director

Kathleen J. Tieg
Director

Reliable water supplies and healthy ecosystems are the very crux of the coequal goals. Let's put them back at the forefront of discussion today and pursue the kinds of collaborative, voluntary approaches that can get real results to improve habitat and stream flows while maintaining the water supplies so critical to our local communities and the state as a whole.

Thank you for your consideration and for the open dialogue.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Martin E. Zvirbulis', with a long horizontal flourish extending to the right.

Martin E. Zvirbulis
General Manager/CEO

Cc: Association of California Water Agencies