

BOARD OF SUPERVISORS COUNTY OF MADERA

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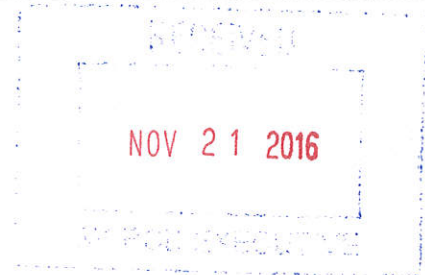
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November 15, 2016

Felicia Marcus, Chairman
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Chairman Marcus:

The Madera County Supervisors appreciates the opportunity to comment on the Phase 1 Revised Draft Substitute Environmental Document (SED) of the State Water Resources Control Board's Bay-Delta Plan. As you know, rural counties such as Madera County face many challenges when it comes to water supply. In light of our ongoing efforts to comply with the Sustainable Groundwater Management Act, the suggested flow requirements in the SED make this compliance especially challenging.

While the tributaries to the San Joaquin River identified in the SED (Merced, Tuolumne, and Stanislaus Rivers) are not geographically located in Madera County, we are only separated by political boundaries. A loss in surface water supplies for our neighbors is a loss for Madera County as well, in that we draw from the San Joaquin Valley Groundwater Basin and face the same economic hurdles as our friends to the North.

The suggested increase in unimpaired flow requirements come at an inopportune time, on the heels of a multi-year drought, coupled with unreliable surface water supplies to contractors. At a macro-level, the proposal fails to achieve the co-equal goals of California's water policy, by apportioning additional water to address the enhancement of the ecosystem health, at the expense of water supply reliability.

San Joaquin Valley communities are struggling with drinking water quality and water supply challenges. The State Water Board's SED further imperils the residents of these communities, as is evident by the Board's own analysis, which recognizes the exacerbation of current groundwater overdraft by 105,000 acre-feet per year (TAF/yr). Additionally, the plan recognizes seven basins underlying the proposed plan area, four of which are identified as critically overdrafted and on an expedited timetable for SGMA implementation.

Changes to the current water supply conditions make achieving success on many fronts near impossible for rural counties. Water supply for replenishment is the cornerstone of improving drinking water supply and replenishment of groundwater. The flow proposal acknowledges that the San Joaquin Water River Watershed does not produce enough water to meet both the existing human demands and to support a healthy ecosystem. The primary sector expected to absorb these losses is

identified clearly as agriculture, noting that drinking water supplies will also suffer, yet ecosystem supply will remain constant. We disagree with the inflexible nature of this proposal and strongly advocate for consideration of the human consumers of groundwater when supplies are apportioned. History has shown that increased water flows have done little to improve the environmental conditions of fish species, yet we continue down a path that ignores the destruction to the San Joaquin Valley's economy and human health. Consider the many disadvantaged citizens in the San Joaquin Valley and quash the continued seizing of the only resource that can improve drinking water quality and provide employment to many families in the affected area.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rick Farinelli', written in a cursive style.

Rick Farinelli
Chairman

cc: Senator Anthony Cannella
Assemblymember Frank Bigelow
Paul Yoder, Shaw/Yoder/Antwih, Inc.