

November 2, 2016

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1000 I Street, 24th Floor
Sacramento, CA 95814-0100

Re: Comment Letter – 2016 Bay-Delta Plan Amendment & SED

Dear Ms. Townsend:

Attached please find a certified copy of Resolution No. 2016-63 Opposing the State Water Resources Control Board 2016 Revised Draft Substitute Environmental Document and Calling for Sustainable Solutions for the Stanislaus River and the Region's Economy, which was approved by the Board of Directors of the Oakdale Irrigation District on October 19, 2016.

Sincerely,

OAKDALE IRRIGATION DISTRICT

Steve Knell, P.E.
General Manager

SK;lfp

Enclosure

OAKDALE IRRIGATION DISTRICT
RESOLUTION NO. 2016-63

RESOLUTION OPPOSING THE STATE WATER RESOURCES
CONTROL BOARD 2016 REVISED DRAFT SUBSTITUTE
ENVIRONMENTAL DOCUMENT AND CALLING FOR SUSTAINABLE
SOLUTIONS FOR THE STANISLAUS RIVER AND THE REGION'S ECONOMY

WHEREAS, the District, along with its' partner agency South San Joaquin Irrigation District (together "Districts"), own certain water rights on the Stanislaus River including pre-1914 appropriative rights to divert water and various post-1914 appropriative rights to store water from the Stanislaus River in various reservoirs; and

WHEREAS, the Districts also own and operate reservoirs on the Stanislaus River, built for the purposes of regional water supply and hydroelectric power production, which together with its senior water rights have provided significant economic stability and vitality for the agricultural and urban communities within our local region; and

WHEREAS, the Oakdale Irrigation District has successfully delivered surface water to the region of Stanislaus and San Joaquin Counties for 107 years, providing the area with a high-quality, reliable surface water supply that has contributed to the economic vitality and strength of the local economy; and

WHEREAS, the State Water Resources Control Board's Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Plan Amendment) and the supporting Draft Revised Substitute Environmental Document (SED) issued in December 2012, proposed to require the Stanislaus, Tuolumne, and Merced rivers release 35 percent of unimpaired flows from February through June each year for environmental benefit; and

WHEREAS, a revised Draft SED was issued on September 15, 2016, and is currently being circulated for public comment; and

WHEREAS, the SWRCB, after a hearing on March 2013 and submittal of comments regarding the adequacy and sustainability of the SED, has now revised and increased the recommendations of the Draft SED to 40% unimpaired flows, with the ultimate intention of Finalizing the SED and updating the Bay-Delta Water Quality Control Plan with its Board for adoption at a date to be determined; and

WHEREAS, flows described in the SED will create "significant and unavoidable" lasting impacts that will harm the socioeconomic welfare of those within Stanislaus, San Joaquin and Merced counties; and

WHEREAS, water supply impacts of flows described in the SED include the loss of hundreds of thousands of acre-feet of surface water that is used to keep agriculture – the region's economic engine -- stable. This loss of water would result in the fallowing of some of the most prime farmland in California; and

WHEREAS, groundwater impacts of flows described in the SED include increased groundwater pumping at a time when California is working to implement the landmark Sustainable Groundwater Management Act. Impacts from the loss of surface water flow described in the SED severely hampers the ability to conjunctively use surface water on farms and to adequately recharge groundwater; and

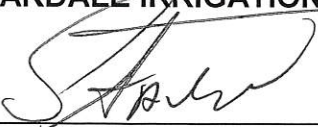
WHEREAS, power impacts of flows described in the SED include public power agencies being resigned to generating more hydropower at a time of low demand, meaning less water is available to generate hydropower in summer when power demand is at its peak. This has economic impacts to public power agencies, and such impacts bear a direct relation to customer electric rates; and

WHEREAS, there is reasonable and significant doubt that the flows described in the SED will benefit native fish populations or promote ecosystem restoration. The SED focuses narrowly on flows as a solution to environmental concerns while ignoring non-flow alternatives such as predator suppression and fish habitat restoration. Such non-flow management measures are often less costly and more effective and preserve our water assets for productive uses.

BE IT THEREFORE RESOLVED, the State Water Resources Control Board should pursue a comprehensive solution which takes into account, rather than dismisses, the impacts listed above. This solution must prioritize non-flow measures to protect native fish species, such as predation reduction programs, before requiring flow increases that would threaten the economic vitality of our region's counties, cities and small family farms.

Upon motion of Director, seconded by Director, and duly submitted to the Board for its consideration, the above-titled resolution was unanimously adopted this 19th day of October, 2016.

OAKDALE IRRIGATION DISTRICT




Steve Webb
President



Steve Knell, P.E.
General Manager/Secretary

I HEREBY CERTIFY that the foregoing is a true and correct copy of the original on file with the Oakdale Irrigation District.

OAKDALE IRRIGATION DISTRICT



Steve Knell, P.E.
General Manager/Secretary