

March 16, 2017

Public Comment
2016 Bay-Delta Plan Amendment & SED
Deadline: 3/17/17 12:00 noon

Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 25th Floor
Sacramento, CA 95812-0100



RE: Opposition to Requests for Extension of Revised Phase I WQCP Update Comment Period

Dear Chair Marcus and Members of the Board:

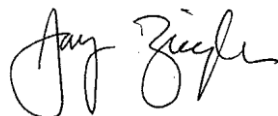
The Nature Conservancy (TNC) has engaged in the State Water Resources Control Board's (Board) Phase 1 update of the Bay-Delta Water Quality Control Plan (WQCP) as well as in dialogues with key stakeholders. TNC is currently participating in discussions convened by the Brown Administration regarding possible voluntary agreements on flow and non-flow measures for the Sacramento River and San Joaquin River with Sacramento and Central Valley water districts.

At this juncture, we respectfully oppose any request to delay or extend the comment period for the revised Phase 1 Supplemental Environmental Document (SED) process. While we are hopeful that voluntary agreements could be negotiated among water agencies and stakeholders, it is our view that parties have not made enough progress in discussions to judge whether settlements will be possible. Therefore, an extension of the Phase I comment period would not be warranted. Furthermore, the Board has already granted two extensions of the original 2016 deadline for commenting on the revised SED. Interested parties have had adequate time to review and provide comment.

An update by the Board of the WQCP is long overdue, remains legally required and is urgently needed to establish a pathway for protecting and improving water quality and for advancing viability of fish and wildlife in the Sacramento-San Joaquin systems. The effort to develop voluntary agreements does not relieve the Board of its obligation to update water quality standards.

We urge you to take no action that would further delay or extend the completion of this important process.

Respectfully,



Jay Ziegler
Director of External Affairs and Policy

Cc: Frances Spivy-Weber, Vice Chair
Steven Moore, Member
Tam Doduc, Member
Dorene D'Adamo, Member
Tom Howard, Executive Director