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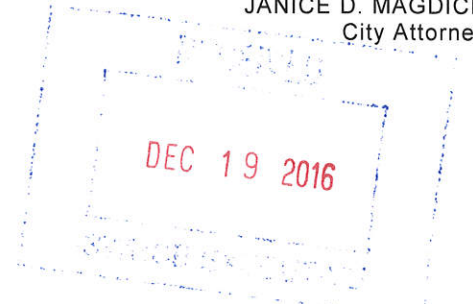
CITY OF LODI

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

December 15, 2016

Ms. Felicia Marcus, Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812

RE: Bay-Delta Supplemental Environmental Document

Dear Chairperson Marcus:

Thank you for the opportunity to comment to on the Bay Delta Supplemental Environmental Document. The Environmental Document proposes to increase minimum flows from the Tuolumne, Stanislaus, and Merced Rivers to nearly double the mandated flows to 40 percent. As a consequence, the proposed action will necessarily reduce surface water supplies in the Central Valley. In tandem with this action, the State has already imposed mandates on Groundwater supplies in the Central Valley under the State Groundwater Management Act (SGMA).

The City of Lodi supports the State's goal to ensure that the San Joaquin groundwater basin becomes sustainable. In light of that support, Lodi has many concerns about the plan's effect on the San Joaquin groundwater basin. Under SGMA, the State concluded that the San Joaquin groundwater basin is critically over drafted and requires expedited action under the Act. Our basin is mandated to reduce groundwater pumping to become sustainable by the year 2040. I am sure this Board recognizes that the State is proposing to hit the Central Valley twice as a result of the confluence of SGMA and the plan before you today: reducing supplies currently sourced from both surface and groundwater.

Our concerns run deeper than the injury of the dual take. Your staff's environmental review actually assumes that the water lost to the rivers will be made up by increased groundwater pumping in evaluating the impact of the plan on the County. Yet this Board knows better than anyone that increased pumping is not possible in the face of the State's SGMA mandates. Even if staff's assumption was correct, Lodi's allocation of groundwater through the SGMA process will necessarily be reduced. Board staff has not assessed reduced allocations to other users, including Lodi, in the basin. As such, staff's analysis is insufficient. The Central Valley is entitled to a full and fair assessment of the impact of this proposal before it is implemented and we will hold this Board to its obligation to provide it.

Sincerely,

Stephen Schwabauer
City Manager