



July 23, 2015

Ms. Felicia Marcus, Chair
 Members of the Board
 State Water Resources Control Board
 P.O. Box 100
 Sacramento, CA 95812-0100

Re: Unimpaired Flows

Dear Chair Marcus and Members of the Board:

The broad coalition of undersigned public water agencies and water companies in every part of California call on the State Water Resources Control Board to abandon its effort to advance an “unimpaired flow” or similar approach to water management in the Sacramento-San Joaquin Delta and San Francisco Bay, including the Water Quality Control Plan process.

Our coalition supports and is implementing progressive and innovative 21st century water management for 39 million people within the stable framework of California’s well-established water rights system. Four consecutive dry years have revealed the fallacy of attempting to mimic “unimpaired flows” to protect beneficial uses in present-day California. In fact, if the “unimpaired flow” approach was in place over the past five years, precious water resources would have already been drained from reservoirs throughout California before we entered these past several dry years. As a result, there would be even less water available in 2015 for the benefit of all beneficial uses, which includes cities and rural communities, fire suppression, cold water to sustain salmon, farms, birds and the Pacific Flyway, and recreational opportunities. Stated another way, an “unimpaired flow” approach would create greater risk for all beneficial uses during dry years. This dynamic would be further exacerbated under the various climate change scenarios evaluated by your administration. We cannot afford to go back in time and rely on defunct measures like an “unimpaired flow” approach for a system that has been highly altered over time. This type of approach will not improve the highly altered system and will only prove to deplete upstream reservoirs that all of California relies on.

We instead urge you and the administration to pursue a different and more practical approach--as called for in your California Water Action Plan--to improve flow regimes that will increase and sustain native fish populations through programs of implementation. This will include both strategic re-managed flows and other non-flow measures such as addressing the predation of native species by invasive species, which appears to be the largest factor that negatively affects salmon in the Central Valley. California needs a progressive approach that will empower 21st century water resources management to support a vibrant economy and environment.

We look forward to discussing new approaches with you in more detail at your earliest convenience.

Sincerely yours,



Jeff Kightlinger
Metropolitan Water District



Beau Goldie
Santa Clara Valley Water District



Steve Knell
San Joaquin River Tributaries Authority



David Guy
Northern California Water Association



Stefanie Morris
State Water Contractors



John Woodling
Regional Water Authority



Dan Masnada
Castaic Lake Water Agency



Dan Nelson
San Luis & Delta Mendota Water Authority



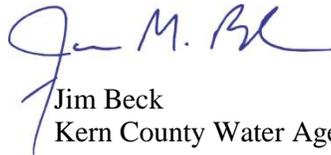
Tom Birmingham
Westlands Water District



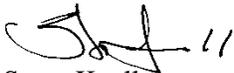
Ray Stokes
Central Coast Water Authority



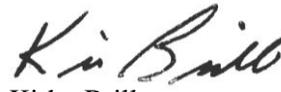
John Sweigard
Merced Irrigation District



Jim Beck
Kern County Water Agency



Steve Knell
Oakdale Irrigation District



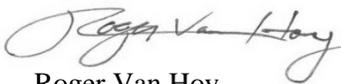
Kirby Brill
Mojave Water Agency



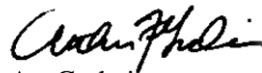
Jill Duerig
Zone 7 Water Agency



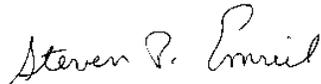
Mike Gilkey
Tulare Lake Basin Water Storage District



Roger Van Hoy
Modesto Irrigation District



Art Godwin
Turlock Irrigation District



Steve Emrick
South San Joaquin Irrigation District

cc: Tom Howard
Michael Lauffer
Michael George
Natural Resources Agency