



STANISLAUS REGIONAL WATER AUTHORITY

P.O. Box 642, Modesto, CA 95353
(209) 577-5213 FAX (209) 577-5477

March 29, 2013

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95814-0100



Subject: Oral Comments on the Adequacy of the Draft SED

Dear Ms. Townsend:

The Stanislaus Regional Water Authority (SRWA) is a Joint Powers Authority formed by the cities of Ceres, Modesto, and Turlock with the purpose of developing a Regional Surface Water Supply Project (RSWSP) that would provide treated potable surface water to the three participating agencies. Surface water would be provided to the RSWSP by the Turlock Irrigation District via a portion of its existing water rights from the Tuolumne River.

As currently proposed, the recommended changes contained in the 'Preferred Alternative' described in the Draft Substitute Environmental Document (Draft SED) to the existing Bay-Delta Plan will increase the flow requirement of water in the Merced, Stanislaus, and Tuolumne Rivers to 35 percent of the unimpaired flow amount from February through June of each year. Since the Tuolumne River is the surface water supply source for the RSWSP, the proposed increase of additional water required to remain in the Tuolumne River all the way to the Sacramento-San Joaquin Delta (and not available to the RSWSP) will have an adverse impact on the underlying groundwater sub-basin by necessitating the three cities to pump more groundwater to make up for lost surface water that would have supplied the RSWSP.

The key reason for using treated surface water in the development of the RSWSP, and why it is such an important regional project, is that groundwater supplies from the sub-basin are not sufficient or sustainable. And without the reliability of a year-round surface water supply for the RSWSP from the Tuolumne River, an overdrafting of the underlying groundwater sub-basin will occur as the three cities try to keep up with the demand of providing potable water to existing and future residences and businesses.

As in with many parts of the state, mitigating groundwater quality issues in our region has become a top priority to potable water suppliers, and anticipating a continuation of the historical trend of increased regulatory requirements on groundwater supplies, providing relief from having to pump more groundwater is critically important.

At this point, it is unclear if the proposed increased flow requirements would even restore the native fish populations or promote any type of sustainable ecosystem improvements. And more to the point, the 'Preferred Alternative' described in the Draft SED ignores other alternatives that appear considerably more economical to implement and may be more effective.

Jeanine Townsend
Clerk to the Board
March 29, 2013

Page Two

On behalf of the SRWA, it is respectfully requested that the State Water Resources Control Board not implement the Draft SED as it is currently written, but instead undertake a more comprehensive evaluation of the proposed action by including the review of alternative solutions to restoring native fish populations and improving ecosystem habitats that take into account the impact increased flow requirements in the Tuolumne River would invariably have on the ability of the RSWSP to provide treated surface water to the cities of Ceres, Modesto, and Turlock.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris T. Vierra". The signature is written in a cursive, flowing style with a prominent initial "C".

Chris T. Vierra
SRWA Board Chair