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July 27, 2018

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

Re: Comments on Proposed Amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Final Substitute Environmental Document

Dear Ms. Townsend,

On behalf of Friant Water Authority (FWA), I thank you for the opportunity to comment on the State Water Resources Control Board's (State Water Board) Proposed Amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Final Substitute Environmental Document (Proposed Final Amendments and Final SED) released on July 6, 2018.

FWA is a public joint-powers authority comprising 15 agencies that receive San Joaquin River water from the Friant Division of the Bureau of Reclamation's (Reclamation) Central Valley Project (CVP). The Friant Division includes 32 contractors and more than 15,000 farms on 1.6 million acres, and it provides water to dozens of communities, including the City of Fresno, California's fifth-largest municipality. FWA also operates and maintains the 152-mile Friant-Kern Canal, a major feature of the CVP.

The Friant Division was planned and designed in the 1930s to address two pressing and interconnected challenges on the eastside of the San Joaquin Valley: (1) regional groundwater overdraft that had been accelerating since the 1880s and (2) sustaining economic stability and development during the tumultuous era following the Dust Bowl and Great Depression. With the completion of the Friant-Kern and Madera canals and Friant Dam by 1950, regional groundwater levels quickly stabilized. The division thus became one of California's first and largest conjunctive use projects. Through continued investment by Friant districts and the federal government, the division has operated successfully and sustainably for nearly 70 years. In recent years

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some of the problems the Friant Division was designed to address have reappeared throughout the San Joaquin Valley, challenging the division's long-term sustainability.

In 2006, Friant Division contractors, Reclamation, and a coalition of environmental groups entered into a historic settlement to provide instream flows for restoration of salmon fisheries in the San Joaquin River below Friant Dam and upstream from the Merced River confluence. This settlement was the culmination of almost 20 years of litigation. FWA, as the Friant Division's representative, remains committed to the settlement and the San Joaquin River Restoration Program (SJRRP), and recently participated with Reclamation, other parties to the settlement, and third-party water users on a funding plan to address implementation of SJRRP. FWA is pleased that in the Proposed Final Amendments and Final SED the State Water Board acknowledges the SJRRP and its contributions toward meeting instream flows on the San Joaquin River.

FWA, also, has a direct interest in water supply reliability for other CVP contractors, especially those dependent on through-Delta deliveries, due to the unique relationship between the Friant Division and the San Joaquin River Exchange Contractors (Exchange Contractors). Any effect on Reclamation's ability to meet Exchange Contractors' water demands has the potential to impact not only Friant Division supplies, but also the ability to implement the SJRRP. Without a complete understanding of the effects to the Exchange Contractors, we remain concerned about impacts to the water supply that we provide to support instream flows on the San Joaquin River.

Thank you, again, for allowing us to comment on this document. We appreciate the immense amount of work that it represents and the role the State Water Board plays in balancing the many water needs of our state.

Sincerely,



Jeff Payne
Director of Water Policy

From: Alexandra Biering <abiering@friantwater.org>
Sent: Friday, July 27, 2018 11:57 AM
To: LSJR-SD-Comments@waterboards.ca.gov; WQCP1Comments
Cc: Jeffrey Payne
Subject: Comment Letter - Revisions to Proposed Bay-Delta Plan Amendments
Attachments: 20180727 BayDeltaPlanUpdateCommentLtr FWA.pdf

Categories: Red Category

Please see the attached comment letter from Friant Water Authority.

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