

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
500	1	I cannot for the life of me figure out how you do this. The salmon are mainly used for commercial fishing. You put endangered animals in zoos when humans are the problem. This is an act of nature. Put them in spawning pools and keep them alive until this drought ends rather than end us. You people have no care for the agriculture of this state. Who is really behind this? Who are the lobbyist pushing this for? This is political and needs to be addressed! This cannot be done!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
501	1	I strongly oppose your plan to increase unimpaired flows on the Stanislaus River because the economic impact to the region will be devastating. The Central Valley feeds the world. Our livelihood depends on this water. Property values will plummet if we lose the irrigation water in this area. We need to have government officials that are actually educated and in touch with reality and the needs of this agriculture area. This area with water will continue to not only feed the world but maintain and create sustainable jobs for its communities and citizens.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
502	1	<p>I am writing because I feel very strongly that California build an infrastructure supporting collecting and storing all run-off water BEFORE it reaches the sea. California needs water infrastructure BEFORE it needs high speed trains or anything else really. Water is the new gold here in California. We need dams to collect and store it for the dry seasons. Believe it.</p> <p>We should begin water desalination plans - based on what Israel has implemented - using solar power to run them. They have turned their water problems around by implementing water solutions. We have a great example to follow- and we have many more resources.</p> <p>California water problems can be fixed! First stop the water from running to the sea by building/using dams that collect it.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
503	1	<p>I am writing to express my opposition to the State Water Resources Control Board Bay-Delta Plan and SED. The proposed actions fail to achieve a balanced approach of meeting California's water policy.</p> <p>The Draft flow objectives will create significant impacts within the San Joaquin River watershed and would only increase conflicts between California's water users.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
504	1	Please do not increase flows in our rivers. It would cause much harm than good to the community.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
506	1	The perpetuity of the salmon, trout and other species that are native to these waterways is important. New Melones Reservoir should adhere to the input of the people that have the information regarding damage to the fish, etc., not Federal entities such as Bureau of Reclamation. For the sake of the environment in the impacted areas of your plan to raise flows -- New Melones Lake, Stanislaus River, Tuolumne River and any other impacted bodies of water -- I feel that this proposal is totally wrong and against all the EPA and other environmental agencies stand for. My vote is a resounding no.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
507	1	It is ludicrous that this is happening. Studies show that your plan to take more water from our region's rivers does not help the fish. Please STOP this practice.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
508	1	I have been working as a consultant in the water supply area for the past 19 years in California to private and public entities. I work closely with Water Board staff on water	Please see Master Response 1.1, General Comments, for responses to comments that either make a general

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		<p>quality and beneficial use issues. I am also a subject matter expert in California hydrogeology, and understand our duty to safeguard water as a public trust resource.</p> <p>We have used groundwater as our buffer against the most recent drought, but have not replenished groundwater supplies. You have a unique opportunity to help fish and allow for more groundwater infiltration by agreeing to allow for at least half the unimpaired flow to remain in the Sacramento-San Joaquin Delta Ecosystem between February and June each year. The current reduced inflows have adversely affected the size and location of the salinity-mixing zone, affecting the entire ecosystem from micro-plankton to marine mammals.</p> <p>I have talked to biologists who believe that smelt will be come extinct, and it may be too late—do you want the same to be said for our flagship species, steelhead salmon? Or do nothing and envision a future with low biodiversity from reduced freshwater inflow that has already changed the chemistry of the Delta, where cyanobacteria thrive. These blue-green algae produce neurotoxins that can make people ill and kill plankton and wildlife. We can and should embrace a new watershed scale management system for the Bay Delta. We humans will continue to innovate and find additional ways to save or create</p> <p>water via recycled water and better storm-water capture for human and agricultural needs</p> <p>.</p> <p>Water is a public trust resource, meaning it belongs to the people of California. Water agencies have water rights, and you can determine which beneficial uses have priority. Please make this your legacy - to change the way that we manage all water that is sustainable for all inhabitants.</p>	<p>comment on the plan amendments or do not raise significant environmental issues.</p>
509	1	<p>Regarding the water for farmers or fish:</p> <p>The land needs water for food, so people all over the world can have food, not just California.</p> <p>The underground water supply is being pumped out because you won't turn on the water for the farmers!</p> <p>Farms are not doing well because someone won't turn on the water for the farms.</p> <p>LET THE FARMERS HAVE THE WATER!!!!</p> <p>There is plenty of water for the farms if you would GIVE IT TO FARMERS!</p> <p>Maybe it's not about the fish at all!</p> <p>Maybe it's about trying to shut down California and hurt farmers so they loose their farms and WEAKEN THE STATE!</p> <p>It seems this fish loving group is anti-American.</p> <p>Using little fish as their excuse to hurt California.</p> <p>If UC Davis wants to keep their labs open, take some of those fish that are so precious to them and let them survey in the hatchery just for the those fish and keep them alive, so</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>they can always have a few of them around.</p> <p>PEOPLE need food, FARMERS need the WATER.</p> <p>My neighbors want the water for the farmers too!</p> <p>GIVE THE FARMERS THE WATER!!!!</p>	
510	1	<p>Our farmers that feed a large portion of the country, not to mention support a huge part of the labor force and economy of our state, should have the foremost consideration in the discussion over water distribution.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
511	1	<p>My comments relate to Mission and Governance. The current State Water Resources Control Board is underneath the California Environmental Protection Agency. The mission of the State Water Resources Control board, created in 1967, is to conserve, enhance, and restore the quality of the State's water resources and ensure their proper allocation and efficient use for the benefit of present and future generations.</p> <p>Focusing on the word generations, we mean generations of people. Focusing on the term "water resources," they are just that: water resources. They are not environmental resources. They are not ecological resources. They are not estuarine processes or habitats, except as far as supporting certain estuarine processes enhances the water resources. As the creation of government of the people, the Environmental Protection Agency protects the people's environment; that is, the environment in which Californians live and experience this life. It is necessary to conserve this human environment so future generations of people can also do so in a way that is sustainable. At times, the Bay Delta Plan Amendments beg the question whether restoration of estuarine habitat or processes or favoring native species actually restores water quality; after all, supporting certain estuarine processes fails to enhance water resources. Capital improvements, are after all, improvements.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.</p>
511	2	<p>Although the Bay-Delta Plan Amendments expend considerable energy on fish populations, I could find no significant mention of vector control in the plan and the dynamic impact of reduced pumping. It does not take a skilled scientist to recognize the current level of pumping in the Delta considerably reduces still water and mosquito populations. Such large-scale habitat disruption as the Bay Delta Plan will require considerable effort among vector-control special districts and a reconsideration of their governance structure. California's State Legislative Analysts' office has noted a considerable deficiency among local agency formation, reformation, and tax allocation, especially in regard to the AB-8 property tax allocation formula. Simply put: local vector abatement agencies revenue allocations are frozen in the mid 1970's when delta water resources were developed in ways to reduce mosquito populations. If the delta changes, mosquito abatement districts must too change. Adoption of a Plan without a Plan for this is not planning. Blind pseudo-scientific restoration of the Delta is a romanticized fiction if we consider its pre-human condition as an uninhabitable mosquito-infested swamp.</p>	<p>As described in Chapter 13, Service Providers, Impact SP-3, of the Revised SED, Phase 1 of the Bay-Delta Plan would not reduce pumping from the Delta as the commenter claims. Chapter 5, Surface Hydrology and Water Quality, section 5.4.2, Methods and Approach, Exports and Outflow of the Revised SED states "The State Water Board is currently in the process of reviewing the export restrictions included in the 2006 Bay-Delta Plan as part of its periodic review of the plan. Through that process, the State Water Board will determine what changes, if any, should be made to the export restrictions. The State Water Board will then determine what actions are needed to implement changes to the flow and export objectives". Please see Master Response 1.2, Water Quality Control Planning Process, section Approach to Bay-Delta Plan Updates, for additional context for the Bay- Delta Plan update.</p>
511	3	<p>The Bay-Delta plan does not consider the purposeful introduction of the mosquitofish, which may be an unconsidered locally favored alternative in light of climate change in the next 20 years. Climate change and delta saline intrusion will likely extend the range of the aedes aegypti mosquito, which returned to the San Pablo bay after the restoration of the national wildlife area and is an immediate human environmental concern due to the emergence of the zika virus, ongoing west-nile virus challenges, planned population</p>	<p>As described in the SED, the plan amendments would establish new water quality objectives for the protection of fish and wildlife beneficial uses, revised water quality objectives for the protection of fish and wildlife and agricultural beneficial uses as required by the Porter-Cologne Water Quality Control Act. As such, the introduction of biological control agents is beyond the scope of the plan amendments and not within the regulatory authority of the State Water Board.</p>

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		expansion of many central valley communities, and uncertain land use planning after the acquisition of five Delta Islands by the Metropolitan Water District. Regarding Chinook Salmon among other things, the Bay Delta Plan does not consider the big picture; hence, I assert the Delta Plan needs to be integrated in an overall conservation plan that hasn't defined ecosystem or environment arbitrarily to meet current convenient objectives.	<p>In Chapter 14, Energy and Greenhouse Gases, the State Water Board addresses climate change as it relates to the plan amendments. The flexibility provided from adaptive implementation in the program of implementation, and the required review and update of the Water Quality Control Plan would allow agencies to respond to climate change.</p> <p>The plan amendments are the first in a series of independent proceedings to comprehensively review and update the 2006 Bay-Delta Plan. In a separate process, a water quality control plan amendment and environmental document will be developed for the Sacramento Bay-Delta watershed update which will consider updates to other elements of the Bay-Delta Plan, including Delta outflows, Sacramento and tributary inflows (other than the SJR inflows), and ecosystem regime shift. Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.</p>
511	4	The Bay-Delta Plan makes no mention of the potential for interbasin transfers and capital projects as a means to increase flow. Furthermore, given the cost of voluntary flow reductions by certain agencies, does it not make more sense to direct development where entitlement pressures are lessened. For example, demanding greater housing density in the SFPUC's south SF Bay wholesale area where there is an efficient use of state water resources (remember your mission) and adequate storage capacity could be coupled with a moratorium of development in the area served by the Contra Costa canal?	New surface water supplies and water transfer are discussed in Chapter 16, Evaluation of Other Indirect and Additional Actions, Section 16.2, Lower San Joaquin River Alternatives—Other Indirect Actions. Demanding greater housing density and placing a moratorium on development in the area served by the Contra Costa Canal are outside of State Water Board's scope of authority and thus are not within the scope of the Water Quality Control Plan.
511	5	<p>Maintaining free navigation in the Delta is a continued condition of statehood per the 1850 Admission of California to the Union Act, which is still Federal law. If California's Bay-Delta plan significantly limited the navigation of the delta's waters in the name of conservation, California could revert to federal territory status (volume 9, Statutes at Large, Page 452) [same thing if the state tried to introduce slavery]. Although this comment may seem fanciful, the United States 1850 was in negotiation with Denmark over the Baltic Sound dues and maintaining free perpetual navigation was a particular concern of Congress at the time, as it was a potential bottleneck to approach the terminus of the Transcontinental Railroad Survey authorized by Congress in 1847.</p> <p>I digress this far into federalism to question why the State is formulating a Delta Plan at all, given that the entire delta is subject to the doctrine of federal servitude (Phillips Petrol v. Mississippi 484 US 469, 480 (1988)) . The federal government can, at any time, impose its authority on the delta, to the point of draining or rerouting the entire waterway. Federal Judges are already ripping up parts of the existing Delta Plans</p>	Please see Master Response, General Comments for discussion regarding the consideration of beneficial uses, transportation and navigation. Please refer to Master Response 1.2, Water Quality Control Planning Process for a discussion regarding the State Water Board's Authorities.
511	6	As a California Taxpayer, I have significant concern with my income going toward this pseudo-scientific environment regulatory charade to appease a regulatory house of cards so it can go forward with the unstated nefarious purpose of keeping the status quo, chipping away at the seniority system of water rights, and building some variant of the peripheral canal. If you want to build it, just build it. I support you. We need to construct adequate infrastructure to impound and convey our water resources in a way that efficiently meets the state's ever-expanding population. The alternative is human population controls - another hallmark of command ecology. Don't pay off narrow-minded environmentalists and their EIR-creeping army of fanatic quasi scientific experts who adhere to a myopic definition of ecosystem and perennial vexatious litigation of dubious standing. Fix the system by starting with yourselves.	Please see Master Response 1.2, Water Quality Control Planning Process regarding the State Water Board's authority to regulate water quality and the water rights priority system.
512	1	I am opposed to your plan to increase flows in our rivers. It is bad for our farmers, drinking	Please see Master Response 1.1, General Comments, for responses to comments that either make a general

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		water and environment. You will ruin Lake McClure and the Merced River.	comment on the plan amendments or do not raise significant environmental issues.
513	1	I am only one voice but I will do what I can to see that anyone that continues to send our water out to sea doesn't get reelected to any office.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
514	1	The science behind the increased flows is just not there. The ag business and economic impact to the region will be devastating if this is allowed to continue. Lake Tulloch and other lakes were designed for water storage and recreational use, not for holding facilities for fish flows. The whole policy is totally backwards and must be stopped immediately.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
515	1	Thank you for the opportunity to add my name to the long list of people who, out of deep concern for the vitality of our Delta, encourage you to commit 50% to 60% of the flow of the San Joaquin River and its tributaries to instream uses.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
515	2	As California marches into the future, we must meet our moral obligation to leave our descendants a rich legacy of natural resources. We cannot in good conscience consume those resources at levels that ignore the physical, chemical, and biological limits of our ecosystem. The environmental damage inherent in those levels of consumption is antithetical to the purposes of the California Environmental Quality Act; to preserve plant and animal communities for future generations, and to create the conditions "under which man and nature can exist in productive harmony." (Public Resources Code, sec. 21001.)	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
515	3	<p>As somebody who lives and works in the watersheds of tributaries to the San Joaquin River, I realize that the standards I advocate will create additional challenges as water rights are adjusted in Phase III of this process. Phase III will be challenging regardless of whether the Board sets the instream flow standard at 30-50%, or at 50-60%. As a Californian, I embrace this resource challenge, as generations of Californians before me embraced theirs. As Californians, we all must come to understand that "every citizen has a responsibility to contribute to the preservation of the environment." (Public Resources Code, sec. 21000.)</p> <p>However, Phase III will only be worth the effort if the result is viable Delta. If we go through all the effort of Phase III, and the fishery collapses anyway due to insufficient instream flows, we will have made a herculean effort for no good reason.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
515	4	If the Board is dead set on the 30-50% standard at this time, I encourage you to also set measureable and objective standards for resource conditions you hope to achieve with this instream flow within the first decade of implementation. If those standards are not achieved, or if the monitoring of those standards is not done, then the instream flow standard should automatically ratchet up to the 50% to 60% standard, with the additional water right adjustments that entails. This will give the advocates for the 30% to 50% standard the proper incentive to maintain a healthy Delta. This will assure the advocates of the 50%-60% standard that ultimately the condition of the Delta will improve.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
516	1	I am writing in favor of increasing river flows to support aquatic communities.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
516	2	Reduction in stream flows have resulted in numerous water quality problems for the Bay-Delta ecosystem and a collapse of historical salmon runs. Decreased flows have concentrated pollutants increasing the toxic effects of contaminants including pesticides, herbicides, heavy metals, pharmaceuticals and manure. Salinities and conductivity have increased and are moving upstream further into the delta. Water ways are choked by	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		<p>aquatic vegetation and we are having more situations where there are water closures because of toxic algae and Cyanobacteria blooms. Reduced flows have resulted in increased temperatures and lowered oxygen concentrations.</p> <p>The life history of many aquatic organisms have developed according to increased flows in the winter and spring. The development of the State of California's Bio-assessment Program allows scientists to document system disturbances and make recommendations regarding the timing and duration of water releases. Increasing water flows will allow for flushing out pollutants and insuring that water ways remain healthy and productive.</p>	
516	3	<p>I am concerned that the importance of San Francisco Bay to the region is often overlooked when considering water flows to and through the Delta and into the Bay. The idea that freshwater should not flow to the Bay is without merit as the Bay is home to many important commercial and endangered species. Tourism, recreational uses such as sailing, fishing, and sightseeing, and commercial shipping through the San Francisco and Oakland shipping terminals depend on a healthy Bay.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
516	4	<p>I am confident that we can meet coequal goals of ecosystem restoration and the support of agriculture and other industries if we work together and reduce water usage in both rural and urban areas. The Bay Area has shown it can reduce its consumption through conservation efforts by up to 30% making water resources available for other purposes. I urge the Board to increase water flows to begin to reverse the damage caused by chronic low flows.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
517	1	<p>I am opposed to your Bay Delta Amendment Plan SED</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
518	1	<p>As a constituent and taxpayer in the district represented by Assemblyman Frank Bigelow, I urge you and your colleagues to give careful consideration to the October 27, 2016 letter from him addressed to your office.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
518	2	<p>We live in the community of Madera Ranchos in eastern Madera county. For the past two years we have suffered from severe water restrictions, including the prohibition of all outdoor landscape irrigation, with the exception of drip irrigation for trees and shrubs only.</p> <p>Recognizing the need for all to conserve, we have complied with these restrictions resulting in dead landscapes in our once beautiful neighborhood. We understand the need to protect the environment to maintain healthy fish populations in the Sacramento/San Joaquin rivers and delta, however, it seems that some locales are being asked to bear an undue amount of the burden.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
518	3	<p>our portion of the valley is almost entirely dependent on the industry of agriculture, which provides produce for much of the state as well as the country. Without the water from the rivers to irrigate cropland, farmers here are forced to pump more groundwater, further reducing the underground aquifer on which we all depend for our water.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
518	4	<p>I urge you and your colleagues to reconsider policies that unfairly deprive our area of needed water in favor of our neighbors to the north.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
519	1	<p>I am writing to oppose any change and or increase of our Northern California water releases</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general</p>

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		into the ocean.	comment on the plan amendments or do not raise significant environmental issues.
520	1	<p>The SJTA [San Joaquin Tributaries Authority] requests the State Water Board accept comments until March 17, 2017. This request is made for the following reasons:</p> <p>NOT A RECIRCULATED DRAFT:</p> <p>The proposed changes to the Water Quality Control Plan are entirely new, as are the amendments to the SED. The 2012 proposal has grown substantially in length (3,500 pages) and complexity. Due to vast differences in the proposed regulations and the manner in which these regulations are analyzed, the document is not really a re-circulated draft, but an entirely new proposal and document.</p>	<p>The comment period was extended for a total duration of six months. Please see Master Response 1.1, General Comments, for information regarding the public review and recirculation process. Also, please refer to Chapter 4, Introduction to Analysis, Section 4.2, Recirculated SED, for a summary of major changes from the 2012 Draft SED.</p>
520	2	<p>The SJTA [San Joaquin Tributaries Authority] requests the State Water Board accept comments until March 17, 2017. This request is made for the following reasons:</p> <p>INCOMPLETE REFERENCE DISCLOSURE:</p> <p>The Draft SED includes numerous referenced assumptions, data and modeling runs the sources for which are not disclosed in the document. In many instances this material forms what appears to be the basis for fundamental conclusions in the SED. The SJTA will be submitting a Public Records Act Request to obtain the undisclosed data, analysis, models and model runs. Without that specific information, neither the SJTA nor its member agencies are able to understand and interpret the SWB impacts analysis, let alone provide a comprehensive set of comments to the analysis.</p>	<p>Please see Master Response 1.1, General Comments, regarding the extension of the public comment period.</p> <p>The State Water Board received four Public Records Act Requests from the San Joaquin Tributaries Authority (SJTA). The State Water Board responded on October 24, 2016, requesting additional time to compile responsive information. Subsequently, the State Water Board responded to three of the requests on November 11, 2016, November 21, 2016, and December 21, 2016. After requesting multiple meetings with SJTA regarding the fourth Public Records Act Request, the State Water Board determined the requestor no longer required a request.</p>
520	3	<p>The SJTA [San Joaquin Tributaries Authority] requests the State Water Board accept comments until March 17, 2017. This request is made for the following reasons:</p> <p>FOCUSED IMPACTS:</p> <p>The existing disclosures and information provided in the SED document make clear that the proposed changes will have a significant impact on the SJTA member agencies' operations, rates, reliability of service and customers. These impacts as stated are devastating to the local economy, agriculture, and groundwater aquifers in the region. Because the costs, both water supply and economic, are so dramatic, especially in dry years, the most directly affected community deserves an opportunity to fully understand and comment on the proposed regulation. We believe anything less fails to comply with CEQA and other applicable laws.</p>	<p>Please see Master Response 1.1, General Comments, regarding the public outreach process and the comment period. Note that the public comment period was extended for a total duration of 6 months. Please also refer to Master Response 1.1 for a general discussion regarding impacts on the local economy, agriculture, and groundwater. For additional details on this topics, please refer to the topic specific master responses.</p>
520	4	<p>The SJTA [San Joaquin Tributaries Authority] and its members request an extension on the Comment Period until March 17, 2017. The SJTA may request additional time based on the SWB's response time to the Public Records Act Request and the amount of information provided in the response.</p>	<p>Please see response to comment 520-3.</p>
521	1	<p>I want you to know that I support efforts to keep the Delta healthy and restore salmon habitat on the tributaries of the San Joaquin River. Instream flow standards must be set.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
521	2	<p>The Water Board should listen to the fisheries scientists and biologists and set the bar higher. I urge you to set the instream flows at 50% to ensure the salmon and the Delta ecosystem survive.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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522	1	<p>In 2012 the Association passed Resolution No. 08-12 recognizing the important environmental and economic roles of the San Francisco Bay Delta Estuary. The Revised Draft Substitute Environmental Document, establishing flow objectives in the lower San Joaquin River, is a positive first step in achieving the first two principles that ABAG called for in Resolution No. 08-12:</p> <p>Bay Delta Ecosystem. Recognize that protection and restoration of a healthy sustainable Bay-Delta ecosystem includes adequate water quality, outflow, and water supply, to support fisheries, wildlife and habitat in perpetuity.</p> <p>Delta Outflows. Recognize that the Bay-Delta ecosystem has been in a state of "chronic drought" due to current water management practices, and ensure adequate Delta outflows to San Francisco Bay to support fisheries, wildlife, habitat, water quality and other beneficial uses.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
522	2	<p>As the State Water Resources Control Board completes Phase I and future updates to the Water Quality Control Plan, we continue to urge that the other principles outlined in Resolution No 08-12 be applied:</p> <p>Regional Self-Sufficiency. Incorporate sustainable approaches for improved water supply, water quality and reliability through the overarching principle of regional self-sufficiency, linked specifically to reducing reliance on exports from the Delta and reducing the current impacts on the Bay-Delta ecosystem.</p> <p>Bay Area Communities. Protect the economic viability of industry, recreation, tourism, fisheries, and agriculture, and the ongoing vitality of communities throughout and along the shoreline of the greater San Francisco Bay-Delta ecosystem.</p> <p>Full Financial Disclosure. The multi-decade costs of restoring habitat in the Bay and the Delta are expected to be significant as would be the full costs associated with any new or modified water management facilities. Realistic cost estimates must be calculated and made clear to both taxpayers and ratepayers throughout California before any final decisions are made. A full cost-benefit analysis of any proposed project must cover all affected geographic areas, and adverse socio-economic impacts need to be minimized and fully mitigated by the beneficiaries of the project.</p> <p>Fair Representation. Represent and include local governments in any new governance structures for the Delta.</p> <p>Flood Protection. Support funding and implementation of urban and non-urban flood protection, at the appropriate level of protection, through rehabilitation and restoration of wetlands wherever feasible, and improvement and maintenance of flood control levees and structures where necessary.</p> <p>In an effort to achieve these principles and strike a balance between beneficial uses, ABAG acknowledges the voluntary settlement conversations currently underway and supports reasonable time for these settlements to be developed.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
522	3	<p>ATT1: Association of Bay Area Governments Resolution No. 08-12</p>	<p>This attachment was included with the comment letter. The attachment does not make a general comment regarding the plan amendments or raise a significant environmental issue.</p>



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523	1	<p>Include All-Season Protection for Fish and Wildlife in the Narrative Objective: The narrative objective should protect fish and wildlife beneficial uses in all months. The content of the narrative objective describes the desired water quality goal; however, it applies only in the months of February to June. Salmon and Central Valley steelhead are found in the lower San Joaquin River and its three tributaries in most months of the year, not just February to June. We recommend the following language be placed in the objective, or added as a footnote, to limit negative impacts to fish and wildlife in the months of July through January. "When implementing the LSJR flow objectives, minimum reservoir carryover storage targets or other requirements to meet the flow objectives should not cause adverse impacts on fish and wildlife at other times of the year."</p>	<p>Please see Master Response 2.1, Amendments to the Water Quality Control Plan, regarding a description of the plan amendments, including the February through June time period in which the LSJR flow objectives apply, and modifications to the plan amendments. The LSJR flow objectives in Table 3 of Appendix K, Revised Water Quality Control Plan, have been modified to require that flows provided to meet the flow objectives shall be managed in a manner to avoid causing significant adverse impacts to fish and wildlife beneficial uses at other times of the year. Please also see Master Response 3.1, Fish Protection, regarding the scientific justification for the plan amendments, including a discussion of year-round flows. Refer to Master Response 2.2, Adaptive Implementation, for information and examples of flow shifting outside the February through June time period.</p>
523	2	<p>Maximize Success of New Approach to Aquatic Resource Protection: The State Water Board is proposing a new approach to managing flows on the San Joaquin River and tributaries. The existing standards are based on fixed monthly flows that vary by an index of water year precipitation called "water year type." The proposed flow standards for the lower San Joaquin River tributaries are providing a "block of water" based on a percent of unimpaired flow [footnote 7: Unimpaired flow is the flow that would accumulate in surface waters in response to rainfall and snowmelt, and flow downstream if there were no reservoirs or diversion to change the quantity, timing, and magnitude of flows.] (UF) within a range. The SED recommends that each of the tributaries provide 30-50% UF and use a starting point of 40% UF. This "block of water" will be managed during the normal spring runoff period by either (a) providing a fixed UF volume, for example 40%, throughout the period: or (b) managing the block of water in real time using adaptive management. This adaptive management approach allows for shifting the percent of UF above or below 40% in response to real-time information about current hydrological and biological conditions to achieve a greater level of beneficial use protection. The SED proposes a working group composed of interested stakeholders, water managers, water users, and biologists make adaptive-management decisions with the approval of the State Water Board or its Executive Director.</p> <p>Real-time adaptive management of a "block of water" has the potential to provide more targeted aquatic-resource protection for the same amount of water as a fixed application of a percent of UF or fixed monthly flows based on water year type.[footnote 8: California water managers have some experience with "block of water" provisions, notably in the ongoing management of the 800,000 acre feet of "(b)(2)" water mandated in the federal Central Valley Project Improvement Act, as well as shorter-term management of the Environmental Water Account in the early 2000s.] The proposed approach will succeed only if the rules that define the "block of water" and the procedures for changing its management are clear from the outset. EPA appreciates the advantage of flexibility as the State Water Board moves forward with this approach; however, many critical elements are left unresolved, to be developed later by a working group not yet fanned. EPA recommends the following revisions to increase the probability that the WQCP amendment s will successfully protect fish and wildlife beneficial uses in the lower San Joaquin River and its tributaries.</p>	<p>Please refer to Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding the LSJR flow objectives and related program of implementation, including the STM Working Group. Also, please see Master Response 2.2, Adaptive Implementation, for information about how adaptive implementation allows for adjustment of the LSJR flows in specified ways to improve the functions of those flows and better achieve the narrative goal of supporting San Joaquin River watershed fish populations migrating through the Delta. The State Water Board may approve adaptive adjustments to the flow requirements if best available scientific information, indicates that the change will be sufficient to support and maintain the natural production of viable native San Joaquin River watershed fish populations migrating through the Delta and will meet any existing biological goals approved by the State Water Board.</p>
523	3	<p>Define how percent of unimpaired flow (UF) will be measured and calculated: The State Water Board should define UF in the final adopted objective in the Bay-Delta WQCP. The objective should identify an equation and assumed coefficients used to calculate percent UF, measured flow data needed as inputs for the UF equation, and locations of measurements. These terms can be added as a footnote to Table 3 in the Bay-Delta WQCP.</p>	<p>Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding calculation of unimpaired flow and percent of unimpaired flow as well as modifications to the plan amendments. Footnote 14 of Table 3 of Appendix K has been modified to provide additional information regarding the method to determine compliance with the percent of unimpaired flow objective on the three</p>

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
		Identifying methods for calculating percent UF will define the volume of the block of water to be managed in a given year and provide certainty for instream and consumptive water uses.	eastside tributaries.
523	4	Add targets to the objective in Table 3 to increase likelihood of protecting fish and wildlife beneficial uses: The SED implementation plan proposes to start the new flow objective at 40% UF for the tributaries and describes targets for storing cold water in reservoirs to use in other parts of the year. EPA recommends including the starting percent UF value and establishing a percent UF at Vernalis in Table 3 of the Bay-Delta WQCP to clearly define the level of intended flow and to protect water from the tributaries while in the lower San Joaquin River channel to Vernalis. EPA notes that the SED shows habitat improvements at 40-60% UF based on modeling that assumes water is stored in reservoirs and available to reduce water temperatures in rivers at other times of the year. Reservoir storage targets for cold water should be identified in the objectives if the benefits predicted in the SED are to be achieved.	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for a description of modifications to the plan amendments. Table 3 of Appendix K has been revised so that the LSJR flow objective that applies to the three eastside tributaries now requires a starting point 40 percent of unimpaired flow, with an allowed adaptive range between 30-50 percent, inclusive, from each of the Stanislaus, Tuolumne, and Merced Rivers from February through June. Please refer to the discussion of the LSJR flow program of implementation and reservoir carryover storage requirements for information as to why specific targets are not established in this proceeding. Please also refer to Master Response 3.2, Surface Water Analyses and Modeling, for additional information regarding the modeling of reservoir operations.
523	5	<p>Adopt a flow range and starting flow value sufficient to achieve the adopted Salmon Protection Objective [footnote 9: Salmon Protection Objective: "water quality conditions shall be maintained, together with other measures in the watershed, sufficient to achieve a doubling of natural production of chinook salmon from the average production of 1967-1991, consistent with the provisions of State and federal law." Table 3, page 14 of State Water Resources Control Board, 13 December 2006, Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary.] and the proposed salmon 'viability' objective: The SED provides a substantial amount of information showing habitat improvements for fish under different flow alternatives. However, the SED does not evaluate the ability of flow alternatives to meet the proposed salmon viability objective or the Salmon Protection Objective, which requires doubling of the population average from the 1967-1991 baseline. Estimating cohort replacement rates (CRR) associated with each flow alternative allows for calculating the time needed to meet salmon doubling. Spring flows show a relationship to fall-run Chinook salmon juvenile survival and numbers of returning adults for spawning. These survival metrics can be used to calculate CRRs which define whether populations are increasing or decreasing. Any population showing a CRR less than 1.0 is trending towards extinction. Typical Chinook salmon populations have CRRs greater than 8. The CRR on the Stanislaus River in this watershed is less than 0.2. Understanding which flow alternatives result in a CRR greater than 1.0 and can achieve doubling in a specified time period will provide support for adopting a flow alternative that can succeed in attaining the narrative Salmon Protection Objective and beneficial-use protection.</p> <p>The 40-50% percent UF range has a greater chance of successfully protecting the instream beneficial use than flows less than 40% UF. Higher percent UF alternatives such as 40-60% result in better rearing temperature conditions and floodplain inundation benefits. The SED shows that lethal temperatures would be reached for salmon in September on the Stanislaus, Tuolumne, and Merced Rivers, and in August, September and October in the lower San Joaquin River in an average year under the 40% UF alternative. Despite forecasted improvements at the 40% UF target, multiple scientific studies indicate flows higher than 40% of UF may be needed to meet the Salmon Protection Objective and protect the beneficial use. [footnote 10: Letter from Delta Independent Science Board to State Water Resources Control Board, March 29, 2013. Available at <a href="http://www.waterboards.ca.rvw/waterrights/waterissues/programs/heardings/baydeltapdsed/docs/com">http://www.waterboards.ca.rvw/waterrights/waterissues/programs/heardings/baydeltapdsed/docs/com</a></p>	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding the salmon doubling objective and how the plan amendments provide progress toward attaining the salmon doubling objective. The response also discusses why modifications to the plan amendments were not made, including why biological targets were not included within the objectives and response to comments that the proposed unimpaired flow value was too low to adequately protect fish and wildlife beneficial uses. Please see Master Response 3.1, Fish Protection, regarding the justification and description of the plan amendments for protecting fish, best available science, and measurable benefits to aquatic resources. See Master Response 2.2, Adaptive Implementation, for information regarding adaptive implementation.

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
		<p>ments0329   3/richardnorgaard.pdf The Independent Science Board suggested that the 40% number "appears to be pushing the limit of benefit to salmon." The proposed 40% UF does not achieve CDFW flow recommendations to protect fall-run Chinook salmon [footnote 11: California Department of Fish and Wildlife testimony to the State Water Board on March 20, 2013 <a href="http://www.waterboards.ca.gov/watenights/waterissues/problems/baydelta/docs/dscdoe/cdfw.pdf">http://www.waterboards.ca.gov/watenights/waterissues/problems/baydelta/docs/dscdoe/cdfw.pdf</a>] or the FWS recommended flow targets necessary to meet the Salmon Protection Objective. [footnote 12: United States Fish and Wildlife Service 2013 testimony to State Water Board on March 20, 2013, available at <a href="http://www.waterboards.ca.gov/waterrights/waterissues/programs/baydeltadocs/dscdocifws.pdf">http://www.waterboards.ca.gov/waterrights/waterissues/programs/baydeltadocs/dscdocifws.pdf</a>; United States Fish and Wildlife Service, September 27, 2005, Recommended Streamflow Schedules To Meet the AFRP Doubling Goal in the San Joaquin River Basin (FWS 2005), p . 27] Research on the Stanislaus River shows that higher flow volumes and flow variability promote instream survival and life history diversity. [footnote 13: Zeug et al., 2014, Response of juvenile Chinook salmon to managed flow: lessons learned from a population at the southern extent of their range in North America. Fisheries Management and Ecology doi: 10.1111/fme.12063. "Greater cumulative discharge and variance in discharge during the migration period resulted in higher survival indices and a larger proportion of juveniles migrating as pre-smolts."] [footnote 14: Sturrock AM, Wikert, JD, Heyne T, Mesick C, Hubbard AE, Hinkelman TM, et al. (2015) Reconstructing the Migratory Behavior and Long-Term Survivorship of Juvenile Chinook Salmon under Contrasting Hydrologic Regimes. PLoS ONE 10(5): eO 122380.] High flows also correlate with better juvenile survival downstream of Vernalis needed to improve the numbers of returning spawners.</p>	
523	6	<p>Include biological goals to the objective as decision rules for shifting within the flow range. Flow criteria or objectives should be linked to biological goals and assessment endpoints to clearly identify the desired condition of biological resources relevant to the established flows. [footnote 15: Final EPA-USGS Technical Report: Protecting Aquatic Life from Effects of Hydrologic Alteration, EPA Report 822-R-16-007 USGS Scientific Investigations Report 20 15-5164, (December 2016)] The State Water Board anticipates the working group will develop these biological goals after approval of the Bay-Delta WQCP updates. However, the criteria or objective itself should define the intended level of protection and EPA strongly recommends including at least one biological goal as the decision rule for moving within range of proposed UF. The objective should state a starting point in the range and allow flow reductions if the biological goal is achieved, and flow increases if biological goals are not achieved. One option is using the existing Salmon Protection Objective and survival rates to guide increases or decreases in flow within the approved range. For example, Table 3 could identify minimum flows starting at 40% UF. Flows could be reduced below 40% UF if juvenile fall-run Chinook salmon freshwater survival rates are sufficient to achieve the Salmon Protection Objective by 2032 and increased above 40% UF if flows are insufficient for achieving the Salmon Protection Objective by 2032. [footnote 16: For example, a new footnote to Table 3 could include the following language: "Minimum flows shall start at 40% with a minimum base flow of 1000 cfs and, with Executive Director approval, can be reduced within the adaptive management range on an annual or long term basis only if juvenile fall-run Chinook salmon freshwater survival rates are sufficient to achieve the Salmon Protection Objective, by 2032. These survival rates, as a five-year geometric mean, must be consistent with achievement of a natural adult production target of fall-run Chinook salmon for each tributary as follows: Stanislaus 22,000, Tuolumne 38,000, Merced 18,000. Minimum flows and base flows can be increased, with Executive Director approval, within the adaptive management range on an annual or long term basis if survival rates are</p>	<p>Please see the response to comment 523-4, for information regarding changes to Table 3 of Appendix K. Also, please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding the plan amendments, including biological goals, and suggested modifications to the plan amendments that were not made, such as rules for changing the percent of unimpaired flow based on biological targets. Master Response 2.2, Adaptive Implementation describes biological goals and other information that will inform adaptive implementation.</p>

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
		insufficient to achieve the Salmon Protection Objective by 2032."]	
523	7	Define management options for shaping flows within the spring window and/or shifted outside the spring months: EPA supports the use of implementation with adaptive management for maximizing aquatic life benefits with the proposed flows. Prior to finalizing the standard, the State Water Board should clearly define the role of working group participants, the structure and function of the decision-making process, specific criteria to trigger management actions, and bounds and targets around shaping flows within the spring and/or shifted to other seasons. The State Water Board can run optimized flow shaping and shifting scenarios to define bounds and targets for shaping flows that optimize biological and water quality benefits with minimum water volume. This would allow the working group to focus on shaping storm flows and implementing flow shifts as hydrologic events occur in real time without needing to seek Executive Director approval. Additionally, the State Water Board should define the accounting framework for protecting water shifted outside the spring window and/or into future years.	Please refer to Appendix K and Master Response 2.2, Adaptive Implementation, for information regarding the difference between adaptive implementation and adaptive management, the four basic elements of adaptive implementation, and examples of adaptive implementation. The master response also includes information about the STM Working Group structure and governance. Please refer to Master Response 2.1, Amendments to the Water Quality Control Plan, for additional information regarding the program of implementation and the STM Working Group.
523	8	San Joaquin River flows should support a migration corridor for salmonids downstream of Vernalis: The ability of salmonids to migrate past Vernalis, through the Delta to the ocean, and then return to spawn is essential to achieving sustainable populations. Most of the freshwater from the San Joaquin River is diverted either upstream of the Phase 1 study area, or as it enters the Delta, which creates a condition whereby almost 40 kilometers of San Joaquin River channels contain water primarily from the Sacramento River; this disrupts salmon navigation signals in almost all months of almost all years and interrupts a continuous migratory corridor connecting the San Joaquin River to the Pacific Ocean. [footnote 17: Fleenor, William et al., February 15, 2010, On developing prescriptions for freshwater flows to sustain desirable fishes in the Sacramento-San Joaquin delta] This discontinuity between Vernalis on the San Joaquin River and the Pacific Ocean adversely affects migratory success for salmon and steelhead due to the mixing of physical and chemical cues. [footnote 18: Marston et al. December 20 12. Delta Flow Factors Influencing Stray Rates of Escaping Adult San Joaquin River Fall-run Chinook Salmon ( <i>Oncorhynchus tshawytscha</i> ), San Francisco Estuary and Watershed Science, 10(4) see also 2010 Flows Report pp. 55-56] Phase 1 is the appropriate forum for determining San Joaquin River basin flows high enough to provide a migratory corridor downstream of the lower San Joaquin River, connecting the Delta to the San Francisco Bay and Pacific Ocean.	Refer to Master Response 1.2, Water Quality Control Planning Process, for information regarding the scope of the Bay-Delta Plan proceedings and plan amendments for different areas in independent proceedings. See also Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding the benefits to migratory corridors that will be achieved through the plan amendments.
523	9	Establish a coordinated monitoring and assessment program: The SED proposal for aquatic resource protection depends heavily on real-time monitoring and assessment of water quality, hydrology and aquatic species. As part of its decision on Phase 1, the State Water Board should establish a Monitoring, Assessment, and Science Program for the lower San Joaquin River and its tributaries to provide the best available data for adaptive management and to measure progress toward reaching water quality and aquatic life goals. The Monitoring, Assessment, and Science Program would replace individual monitoring requirements for consumptive users. EPA recommends the State Water Board work with agency partners to develop a comprehensive monitoring and assessment framework that identifies a monitoring design to determine effectiveness of new and modified water quality standards, integrates aquatic resource monitoring requirements in federal and state natural resource laws, and is coordinated with the long-established Interagency Ecological Program (IEP) and emerging Delta and San Joaquin River Regional Monitoring Programs.	Please refer to Appendix K and Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding monitoring and assessment, including through the San Joaquin River Monitoring and Evaluation Program (SJR MEP). The SJR MEP is a comprehensive monitoring, special studies, evaluation, and reporting program that will help to determine compliance with the LSJR flow objectives, inform adaptive implementation, investigate the technical factors involved in water quality control, and identify potential needed future changes to the LSJR flow objectives, including flows for other times of the year. In order to leverage expertise and limited resources, parties are encouraged, but not required, to work collaboratively with each other, the STM Working Group, USBR, DWR, the Delta Science Program or other appropriate parties.

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
525	1	<p>As a wholesale customer of SFPUC that purchases 100% of its potable water supply from the San Francisco Regional Water System, water supply available to Stanford under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.</p> <p>Such reductions in water supply from the SFPUC may force Stanford University and other nearby water retailers to use more local groundwater supplies, causing unknown, and potentially significant undesirable results, which were not adequately analyzed in the SED.</p>	<p>Please see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, regarding the State Water Board’s evaluation of potential reductions in water supply and associated economic considerations and other impacts within the SFPUC Regional Water System (RWS) service area with implementation of the plan amendments. The master response identifies the main points of disagreement or differing assumptions between the SED and the comments. As described in Master Response 8.5, the SED identified reasonably foreseeable actions that could be taken by affected entities to comply with the plan amendments and in response to reduced surface water supplies. These actions did not include the severe mandatory rationing described by SFPUC because it was not reasonably foreseeable that a water supplier would impose drastic mandatory water rationing on its customers without first attempting other actions to replace any reductions in water supplies with alternative sources of water, such as through water transfers. Please also see Master Response 8.5 regarding groundwater use. Finally, please also see Master Response 1.1, General Comments, for a general discussion as to the approach to the analyses contained in the SED, and the programmatic nature of analysis, and Master Response 8.5, for a more specific discussion of programmatic analysis.</p>
525	2	<p>Under drought conditions, Stanford may be forced to rely more on local surface water supplies, causing unknown, and potentially significant impacts; in addition, local surface water supplies would likely be greatly depleted or completely unavailable during drought conditions, which were not adequately analyzed in the SED.</p>	<p>Please see response to comment 525-1. The comment does not identify the potentially significant impacts that could occur and identifies them as “unknown”.</p>
525	3	<p>Stanford has had significant success in water conservation in the past 15 years. The success of Stanford’s Water Conservation and Efficiency Program is demonstrated by decreased domestic water use from 2.7 million gallons per day (MGD) in 2001 to 2.1 mgd in 2014, despite more than 2.5 million square feet of new campus facilities added. In 2015, a new energy facility was commissioned and resulted in an additional 15% reduction in Stanford’s domestic water use. These achievements leave few opportunities for further efficiency enhancements to reduce demand to the levels of water supplies estimated under the SED proposal. The conserved supply is already dedicated to Stanford’s planned campus growth.</p>	<p>The State Water Board acknowledges Stanford’s water conservation effort and ongoing commitment to demand management. This comment does not raise significant environmental issues or make a general comment regarding the plan amendments. Please see response to comment 525-1.</p>
525	4	<p>Given the interconnected nature of the economy within the Bay Area and BAWSCA service area, Stanford will be impacted by water shortages on the San Francisco Regional Water System resulting in economic and environmental impacts to neighboring communities and the Bay Area as a whole.</p> <p>As non-essential outdoor use represents a relatively small proportion of Stanford’s institutional potable water demand, Stanford has fewer opportunities to reduce water demand and use without substantial modification to campus operations and significant impact to research and educational facilities.</p>	<p>Please see response to comment 525-1. Please also see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, for a discussion regarding economic considerations, growth effects, environmental effects based on a rationing-only approach, and demand management.</p>
525	5	<p>In lights of these aforementioned impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated by reference, the Stanford requests that environmental and economic impacts of any shortage on the San Francisco Regional Water System, and the associated lost jobs and delayed development, be fully and adequately analyzed as part of the SWRCB’s proposed flow alternatives. Such full and adequate analysis should be given equal consideration with other elements of the WQCP amendments and SED in the SWRCB’s deliberations and decision making on the WQCP amendments and SED.</p>	<p>Please see responses to comments 525-1 and 525-4. To the extent that this comment letter raises similar issues or the same issues raised by SFPUC or BAWSCA, please refer to letter 1166 or letter 1191 to review responses to those letters.</p>
525	6	<p>The Governor has indicated his strong support for negotiated voluntary agreements to resolve these issues. Stanford requests that the SWRCB provide adequate time for a voluntary agreement to be reached amongst the stakeholders prior to any action on the</p>	<p>Please see Master Response 1.1, General Comments, for information regarding voluntary agreements and collaboration with agencies.</p>

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		<p>SED. Please give this settlement process a chance for success instead of expediting implementation of the current proposal. Stanford supports SFPUC in its commitment to participating in efforts to improve and enhance fish and wildlife conditions within the Tuolumne River and the San Joaquin Estuary. Stanford also shares BAWSCA's and SFPUC's commitment to work closely with the diverse interests and stakeholders in the Bay Area to do their part to contribute to shared solutions.</p>	
526	1	<p>The City of Hayward has serious concerns with the SWRCB's current proposal to substantially change the flow objectives for the Tuolumne River and the adequacy of the Draft SED to fully consider and analyze the potentially significant and unavoidable impacts the SWRCB's proposal would have on San Francisco Public Utility Commission's (SFPUC) wholesale water customers.</p>	<p>Please refer to Master Response 1.1, General Comments, regarding the general approach and adequacy of the SED impact analysis. Also please see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, regarding the State Water Board's evaluation of potential reductions in water supply and associated economic considerations and other impacts within the SFPUC Regional Water System (RWS) service area with implementation of the plan amendments. The master response identifies the main points of disagreement or differing assumptions between the SED and the comments. As described in Master Response 8.5, the SED identified reasonably foreseeable actions that could be taken by affected entities to comply with the plan amendments and in response to reduced surface water supplies. These actions did not include the severe mandatory rationing described by SFPUC because it was not reasonably foreseeable that a water supplier would impose drastic mandatory water rationing on its customers without first attempting other actions to replace any reductions in water supplies with alternative sources of water, such as through water transfers.</p> <p>To the extent that this comment letter raises similar issues or the same issues raised by SFPUC or BAWSCA, please refer to letter 1166 or letter 1191 to review responses to those letters.</p>
526	2	<p>The City of Hayward is currently the second largest purchaser of wholesale water from SFPUC. The City provides drinking water to approximately 150,000 residents and over 8,700 businesses and other non-residential customers in Alameda County. California State University-East Bay, Chabot Community College, and Life Chiropractic College West are among the higher education institutions served by City water. The City purchases potable water supply from SFPUC under the terms of a 1962 individual water sales contract with SFPUC. Similar to all SFPUC wholesale water customers, the quantity of water available to the City is subject to reduction in dry years or other periods of water supply shortage.</p>	<p>This comment provides information regarding the number of residential, as well as business and non-residential drinking water customers in Alameda County, and where Hayward's potable water is purchased but does not raise significant environmental issues or make a general comment regarding the plan amendments. As such, no further response is required.</p>
526	3	<p>Under the Draft SED, the SWRCB is proposing substantial changes to flow objectives for the Tuolumne River. These changes are anticipated to significantly reduce the quantity of surface water available for diversion by SFPUC. Based on SFPUC's water supply impact analysis of the SWRCB's proposed instream flow schedule for the Tuolumne River, rationing levels for the SFPUC Regional Water System could exceed 50% under drought conditions at normal or contract level demands and the number of dry year shortages could double or triple. Of equal concern to the City of Hayward is the severity of the rationing that SFPUC is projecting would be required in the first year of a drought to be able to manage through multi-year droughts. Even at current levels of demand, SFPUC is projecting an increase in the severity of rationing that would be required if the SWRCB implements the Draft SED proposal.</p>	<p>This comment provides information on the commenters' interpretation of the SFPUC water supply impact analysis. It does not raise significant environmental issues or make a general comment regarding the plan amendments. Please see response to comment 526-1.</p>
526	4	<p>The City of Hayward is currently one of the lowest water users per capita in the State of California. The City's residential per capita water use has decreased over the last eight years from 68 gallons per capita per day (gpcd) in 2008 to 46 gpcd in 2016. During the recent drought, the SWRCB recognized the City's low water use by placing the City in the lowest assigned tier for urban water supplier conservation standards, with an 8% reduction requirement. In response, the City of Hayward achieved a water use reduction of 23% in</p>	<p>The State Water Board acknowledges City of Hayward's water conservation effort and ongoing commitment to demand management. This comment does not raise significant environmental issues or make a general comment regarding the plan amendments. Please see response to comment 526-1.</p>

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
		<p>2016 as compared to 2013, with substantial water use reductions occurring in every customer classification. Hayward customers have historically been excellent stewards of water resources and they continued to do their part during the recent drought.</p> <p>Since Hayward purchases 100% of its potable water supply from SFPUC, the City does not have the needed flexibility to achieve further substantial reductions in water use without causing severe and unavoidable impacts to the residents and businesses located in Hayward.</p>	
526	5	<p>The City of Hayward’s residential per capita use in 2016 was 46 gpcd, which was below the minimum quantity of 50 gpcd used by the State to calculate minimum health and safety needs. (Cal. Code Regs., tit. 23, section 878.1, subds. (a)-(b) [operative March 30, 2015 and repealed Dec. 29, 2015]). Given that SFPUC’s water supply impact analysis of the Draft SED proposal shows required water supply cutbacks to its wholesale customers could approach 50% or greater, which would far exceed the water supply reductions that were achieved during the recent drought, the City would be forced to limit all noncritical uses of water so that water is available for human consumption, sanitation, and fire protection. Even with implementing all the water supply shortage actions identified in the City’s 2015 Urban Water Management Plan, the City of Hayward is likely to experience severe and unavoidable impacts due to the extreme water supply shortages. In addition, the City’s ongoing commitment to demand management and efforts to lock-in a portion of the water conservation savings realized by its customers during the recent drought will make it even more difficult to achieve greater water supply reductions in the future. The Draft SED should fully consider and adequately analyze impacts to the City of Hayward’s ability to provide sufficient water supply for the public health and safety needs of its residents.</p>	<p>Please see responses to comments 526-1. Please refer to Master Response 2.1, Amendments to the Water Quality Control Plan, for additional discussion regarding health and safety and the emergency provision. Please also see Master Response 3.6, Service Providers, for a discussion of Water Code Section 106 and water for minimum health and safety needs.</p>
526	6	<p>The City of Hayward supplies over 25% of the water it purchases from SFPUC to commercial, institutional, and industrial businesses. Hayward is also home to two regional and post-secondary educational institutions, California State University-East Bay and Chabot Community College, and Life Chiropractic College West. The potential consequences of the SED proposal on businesses include major job losses, slower economic growth and delayed community development in the City of Hayward’s service area. The environmental and economic impacts of shortages on the SFPUC Regional Water System, and the associated lost jobs and delayed development, should be fully and adequately analyzed as part of the SWRCB’s proposed flow alternatives.</p>	<p>Please see response 526-1. Please also see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, for a discussion regarding economic considerations, growth effects, environmental effects based on a rationing-only approach, and demand management.</p>
526	7	<p>The proposed severity and frequency of water supply shortages that SFPUC anticipates would occur under the SWRCB’s proposal would force the City of Hayward to develop supplemental water supply sources to address the risk of severe impacts to the residents and businesses within the City of Hayward. If the SWRCB’s proposed instream requirements for the Tuolumne River were to be adopted, the City would need to look at development and long-term use of other reliable, high quality water supply options to provide additional water in drought years. The Draft SED must fully consider and adequately analyze the potential environmental impacts of the City of Hayward, SFPUC, and other SFPUC wholesale customers developing and implementing supplement water supply projects to mitigate the potential for severe water supply shortages due to the SWRCB’s proposal.</p>	<p>Please see response to comments 526-1 and 526-6. Also, please refer to Master Response 1.1, General Comments, regarding the general approach to the analysis, the adequacy of the SED impact analysis and mitigation measures.</p>
526	8	<p>The Draft SED encourages stakeholders to work together to reach voluntary agreements that could implement the Bay-Delta objectives for fish and wildlife beneficial uses. The City of Hayward supports the continued efforts of SFPUC and the Bay Area Water Supply and</p>	<p>Please see Master Response 1.1, General Comments, for information regarding voluntary agreements and collaboration with agencies.</p>

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		Conservation Agency (BAWSCA) to work closely with the diverse interests and stakeholders to develop a shared solution for the Tuolumne River and Bay-Delta. The City of Hayward requests that the SWRCB provide adequate time for voluntary agreements to be reached amongst the stakeholders and for other elements of the Bay-Delta Plan to be developed, prior to any action on the SED.	
527	1	As a wholesale customer of SFPUC that purchases 100% of its potable water supply from the San Francisco Regional Water System, water supply available to the MPWD [Mid-Peninsula Water District] under the SED proposal could be reduced more than 50% under drought conditions for multiple consecutive years.	Please see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, regarding the State Water Board’s evaluation of potential reductions in water supply and associated economic considerations and other impacts within the SFPUC Regional Water System (RWS) service area with implementation of the plan amendments. The master response identifies the main points of disagreement or differing assumptions between the SED and the comments. As described in Master Response 8.5, the SED identified reasonably foreseeable actions that could be taken by affected entities to comply with the plan amendments and in response to reduced surface water supplies. These actions did not include the severe mandatory rationing described by SFPUC because it was not reasonably foreseeable that a water supplier would impose drastic mandatory water rationing on its customers without first attempting other actions to replace any reductions in water supplies with alternative sources of water, such as through water transfers.
527	2	MPWD [Mid-Peninsula Water District] has made significant strides in water conservation in the past 10 years. Residential per capita water use decreased from an average baseline of 126 gallons per capita day (gpcd) over the 5-year period between 2003 and 2007 to 85 gpcd in 2015.	This comment provides information on residential per capita water use reduction for the Mid-Peninsula Water District over the 5-year period between 2003 and 2007, and in 2015, but does not raise significant environmental issues or make a general comment regarding the plan amendments. The State Water Board acknowledges MPWD’s water conservation effort and ongoing commitment to demand management.
527	3	Based on the MPWD’s [Mid-Peninsula Water District] 2015 Urban Water Management Plan, this critical cut to water supply would force the MPWD to take a number of significant actions including, but not limited to, implementation of a rationing program, eliminate line flushing, modify rate structures and/or implement rationing surcharges, impose a moratorium or net zero demand increase on new service connections, prohibit landscapes, issue fines/penalties, utilize flow restrictors, and/or rely on water use surveys to minimize nonessential uses of water so that water is available for human consumption, sanitation, and fire protection.	Please see response to comment 527-1. This comment does not make a general comment regarding the plan amendments or raise significant environmental issues.
527	4	<p>The MPWD [Mid-Peninsula Water District] serves water to a total of 7,977 connections – 70% residential customers and 30% businesses, commercial/industrial/institutional, and other non-residential customers. Potential consequences of the SED proposal include health and safety concerns due to lack of potable supplies, major job losses, slower economic growth and delayed community development in the MPWD service area.</p> <p>Since outdoor use represents a relatively small proportion of the MPWD’s commercial, industrial, and institutional account water demand, commercial, industrial and institutional customers generally have fewer opportunities to reduce water use without changing their operations or incurring significant economic impacts.</p>	Please see response to comments 527-1. Please refer to Master Response 2.1, Amendments to the Water Quality Control Plan, for additional discussion regarding health and safety and the emergency provision. Please also see Master Response 3.6, Service Providers, for a discussion of Water Code Section 106 and water for minimum health and safety needs. Please also see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, regarding economic considerations, growth effects, and demand management.
527	5	There are no alternative groundwater sources or local water supplies available within the MPWD [Mid-Peninsula Water District] service area.	Please see response to comment 527-1. This comment does not make a general comment regarding the plan amendments or raise significant environmental issues.
527	6	In lights of these aforementioned significant impacts as well as those articulated in the BAWSCA and SFPUC comment letters incorporated here by reference, the MPWD [Mid-Peninsula Water District] requests that environmental and economic impacts of any shortage on the San Francisco Regional Water System, and the associated lost jobs and	Please see responses to comments 527-1 and 527-4. Please also see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, for a discussion regarding economic considerations, growth effects, environmental effects based on a rationing-only approach, and demand management. To the extent that this comment letter raises similar issues or the same issues raised by



**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		<p>delayed development, be fully and adequately analyzed as part of the SWRCB's proposed flow alternatives. Such full and adequate analysis should be given at least equal weight with all other elements of the SWRCB's subsequent deliberations and decision making.</p>	<p>SFPUC or BAWSCA, please refer to letter 1166 or letter 1191 to review responses to those letters.</p>
527	7	<p>The Governor has indicated his strong support for negotiated voluntary agreements to resolve these issues. The MPWD [Mid-Peninsula Water District] requests that the SWRCB provide adequate time for voluntary agreements to be reached amongst the stakeholders prior to any action on the SED. Please give this settlement process a chance for success instead of expediting implementation of the current proposal. The MPWD shares BAWSCA's commitment to continue working closely with the diverse interests and stakeholders to develop that shared solution.</p>	<p>Please see Master Response 1.1, General Comments, for information regarding voluntary agreements and collaboration with agencies.</p>
528	1	<p>Daly City is a wholesale customer of the SFPUC that on average purchases 55% of its potable water supply from the San Francisco Regional Water System, with the remaining 45% from local groundwater supplies from the Westside Basin Aquifer. Under the SED proposal, the State Water Resources Control Board (Board) proposes substantial changes to flow objectives for the Tuolumne River, and these changes are anticipated to result in significantly reduced surface water available for diversion. Daly City is also one of the 26 member agencies of BAWSCA, and BAWSCA is on record stating it "will work with other stakeholders to protect water quality in the Bay Delta for humans, fish and other wildlife." Daly City will partner with BAWSCA as it also recognizes that the Bay Delta ecosystem is not sustainable. However, a path forward as envisioned by the Board under the SED process is itself not sustainable.</p>	<p>Please see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, regarding the State Water Board's evaluation of potential reductions in water supply and associated economic considerations and other impacts within the SFPUC Regional Water System (RWS) service area with implementation of the plan amendments. The master response identifies the main points of disagreement or differing assumptions between the SED and the comments. As described in Master Response 8.5, the SED identified reasonably foreseeable actions that could be taken by affected entities to comply with the plan amendments and in response to reduced surface water supplies. These actions did not include the severe mandatory rationing described by SFPUC because it was not reasonably foreseeable that a water supplier would impose drastic mandatory water rationing on its customers without first attempting other actions to replace any reductions in water supplies with alternative sources of water, such as through water transfers.</p> <p>To the extent that this comment letter raises similar issues or the same issues raised by SFPUC or BAWSCA, please refer to letter 1166 or letter 1191 to review responses to those letters.</p>
528	2	<p>The City of Daly City has serious concerns over the adequacy of the Board's reliance on the environmental document which fails to fully address a number of significant impacts affecting local water supplies with an amended 40% unimpaired flow (February to June) on the San Joaquin river annually and resulting consequences to local land use planning.</p> <p>Locally, Daly City continues to face a structural budget deficit as it has yet to come out from the economic recession of 2008. To address this deficit, local land use planning is focused on the diversification of retail, commercial, and expanded housing as a means to recover from impacts associated with the economic downturn. Most of Daly City's available "new water" to meet this local demand is a result of conserved water, used to bolster an existing surface water Individual Supply Guarantee from the San Francisco Regional Water System of 4.292 million gallons a day assuming Regional Deliveries of 184 million gallons a day.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that make a general comment regarding the plan amendments and for a discussion of the overall approach and level of analysis in the SED.</p>
528	3	<p>Daly City enjoys among the lowest per person water use in the Bay Area, which does not seem to engender much recognition within the current public discourse. Before this most recent drought, Daly City residents used 63 gallons per person per day, which is over one-third of the average Daly City residential use before the 1976 drought of 104 gallons per person per day. For calendar year 2016, Daly City retained a 4% mandated conservation target, and the community achieved just over 11% in savings from its 2013 baseline usage with a resulting per person use of 52 gallons per person per day.</p>	<p>This comment provides information on residential per capita water use reduction for the Daily City but does not raise significant environmental issues or make a general comment regarding the plan amendments. The State Water Board acknowledges Daily City's water conservation effort and ongoing commitment to demand management.</p>
528	4	<p>Under the SED proposal, Daly City residents would be subject to upwards of 40% mandated cutbacks in dry years and be exposed to a three-fold increase in drought frequency. If the unimpaired flow regime under the SED comes to reality, it would place added burdens on</p>	<p>Please see response to comment 528-1. Please also see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, regarding economic considerations, growth</p>

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		residents who can justly claim a strong conservation ethic. This impact to local supplies places an uncertainty on economic development in Daly City such that locally anticipated projects may not go forward as planned. Such impact has not been adequately addressed part of the Board’s analysis presented in the SED.	effects, and demand management.
528	5	It is precisely the inherent uncertainty upon water supplies that is inadequately addressed under the environmental review before the Board, coupled with a reliance on flow regime when the issues confronting the Delta restoration are far more complex, that is the basis for Daly City’s concerns posed in this letter. There are other fishery management options, gravel enhancement, predatory fish removal, and habitat restoration, just to name a few, than just a singular focus on flows. A flawed environmental analysis will simply lead to lengthy court battles by one party or another and will do nothing to achieve policies to restore the Bay-Delta estuary.	Please see response to comment 528-1. Non-flow measures are considered in Chapter 16, Evaluation of Other Indirect Actions and Additional Actions, Section 16.3, Lower San Joaquin River Alternatives – Non-Flow Measures. For further discussion on State Water Board’s authority related to non-flow measures and the incorporation of non-flow measures into the plan amendments, please see Master Response 5.2, Incorporation of Non-Flow Measures.
528	6	Daly City concurs with a settlement approach, as advocated by BAWSCA and SFPUC, as a rational way forward because there is too much at stake and too much uncertainty associated with the SED proposal. Allowing all stakeholders to craft a negotiated settlement provides for a strategic process for all parties on how to share the river better and enhance ecologic sustainability sought by all. It is an approach Daly City hopes the Board will endorse.	Please see Master Response 1.1, General Comments, for information regarding voluntary agreements and collaboration with agencies. To the extent that this comment letter raises similar issues or the same issues raised by SFPUC or BAWSCA, please refer to letter 1166 or letter 1191 to review responses to those letters.
530	1	<p>According to the San Francisco Estuary Partnership’s 2015 State of the Estuary Report (<a href="http://www.sfestuary.org/about-the-estuary/soter/">http://www.sfestuary.org/about-the-estuary/soter/</a>), a third or less of the natural runoff from the San Joaquin River and other tributaries now reaches the estuary (Figure 1), creating negative impacts to water quality and habitat for native fish and wildlife. This depletion of freshwater inflow, a vital component of estuaries, has contributed to declining salmon and other native fish and wildlife populations, deteriorating water quality, reduced sediment delivery, more frequent toxic algal blooms, and higher pollutant concentrations in the Bay and Delta.</p> <p>The Partnership’s foundational document, the Comprehensive Conservation and Management Plan, first released in 1993 and recently updated in 2016, has consistently identified improvements to freshwater inflows as one of the key actions needed for a thriving, resilient San Francisco estuary. The 2016 update, known as the Estuary Blueprint, calls on the State Board to update the WQCP flow objectives, and commits the Partnership to providing concise, scientifically sound data to inform this process.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
530	2	[ATT1:] Freshwater Flows: Bay Inflow by Decade. Figure 1. Freshwater inflows from the Delta to the Bay, as a percentage of unimpaired flow, have been declining for the last 60 years. Source: State of the Estuary Report 2015	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
530	3	The overall approach the State Board has taken to the Phase 1 update is appropriate and well-grounded in current science; however, the proposed flow objectives of an adaptively managed range of 30-50% unimpaired flow (UF), with a recommended starting point of 40% UF, may not adequately protect fish and wildlife and water quality in the estuary, lower San Joaquin River, and San Joaquin tributaries. In its comment letter dated December 29, 2016, the Environmental Protection Agency (EPA) states: "Despite forecasted improvements at the 40% UF target, multiple scientific studies indicate flows higher than 40% of UF may be needed to meet the Salmon Protection Objective and protect the beneficial use. The proposed 40% UF does not achieve CDFW [California Department of Fish and Wildlife] flow	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
		<p>recommendations...or the FWS [U.S. Fish and Wildlife Service] recommended flow targets..." The California Department of Fish and Wildlife, in its comment letter dated March 28, 2013 on the previously proposed flow objectives, states, "Substantial evidence demonstrates that approximately 50-60% unimpaired flow is the minimum necessary to reestablish and sustain fish and wildlife beneficial uses."</p>	
530	4	<p>We commend the State Board for recognizing the importance of non-flow measures as part of the complex interaction of factors that can assist in recovery of the estuarine ecosystem. Yet we are concerned that the best available science provided by fish and wildlife agencies, academia, conservation groups, and others shows that more water from the San Joaquin River system is needed to reach the estuary throughout the year, especially in the critical winter and spring period. The Phase 1 updates to the WQCP will set minimum requirements for the amount of inflow from the tributary rivers of the</p> <p>San Joaquin basin to the estuary. Appropriate standards set in Phase 1 can begin to improve this degraded system, repair the damages of the past, and provide resiliency to the natural resources of the Bay and Delta in the future. These standards should provide both the safeguards and flexibility needed to ensure protection of endangered fish and wildlife and human health and safety during severe or extended drought. We support timely and strong action by the Board to increase the vitally important flows on these overburdened rivers that feed the Bay-Delta ecosystem.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
530	5	<p>The Board's final decision should be based on the best available science, ensure that enough water reaches the estuary to reverse the declines of fish and wildlife and protect the beneficial uses of water as required by state and federal law, and provide adequate protection for our Bay Area and coastal fishing communities, recreation, water quality, and the wildlife of our great San Francisco Bay-Delta estuary. The San Francisco Estuary provides an unparalleled place to work, live, play, and raise our families. Bay and Delta residents are invested in stewardship of the Estuary, as evidenced by the recent passage of Measure AA, funding Bay wetland restoration. In order to remain good stewards of the Estuary and promote continued economic growth, however, we must face the environmental challenges ahead of us.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
532	1	<p>Rural counties such as Madera County face many challenges when it comes to water supply. In light of our ongoing efforts to comply with the Sustainable Groundwater Management Act, the suggested flow requirements in the SED make this compliance especially challenging.</p> <p>While the tributaries to the San Joaquin River identified in the SED (Merced, Tuolumne, and Stanislaus Rivers) are not geographically located in Madera County, we are only separated by political boundaries. A loss in surface water supplies for our neighbors is a loss for Madera County as well, in that we draw from the San Joaquin Valley Groundwater Basin and face the same economic hurdles as our friends to the north.</p>	<p>The existing groundwater overdraft conditions in the plan area are legacy issues caused by unsustainable agricultural expansion; SGMA was passed by the legislature in 2014 to address overdraft issues. The State Water Board acknowledges that it will be challenging, but SGMA compliance cannot occur at the expense of reasonably protecting surface water beneficial uses; both groundwater and surface water must be protected.</p> <p>The SED and plan amendments do not require or encourage increases in groundwater pumping as a response to reductions in surface water. The SED reflects the historical response of water users to increase groundwater pumping when surface water availability is reduced. Comprehensively addressing both resources allows for integrated planning that does not trade impacts between surface water and groundwater and ensures long-term adequate drinking water supplies. It will be up to local entities to determine the precise actions that would be taken in response to the implementation of the plan amendments, with or without the future condition of SGMA.</p> <p>It is worth noting that SGMA does not allow one subbasin to attain sustainability at the expense of an adjoining subbasin (Cal. Code Regs., div. 2, § 350.4, subdv. f). For further discussion on SGMA and the plan amendments, please see Master Response 3.4, Groundwater and the Sustainable Groundwater</p>

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
			<p>Management Act.</p> <p>The Sacramento–San Joaquin Delta Reform Act of 2009 (Act) does not require the State Water Board to achieve the coequal goals of protecting water supply reliability and the Delta ecosystem when considering adopting flow water quality objectives in the Bay-Delta Plan. For further discussion on the requirement of the Act in regard to the co-equal goal, please see Master Response 1.1, General Comments.</p> <p>Please see Master Response 1.2, Water Quality Control Planning Process, for information regarding the consideration of beneficial uses and the balancing of human and environmental water demands.</p> <p>Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding implementation of the plan amendments.</p> <p>Please see Master Response 3.1, Fish Protection, for information regarding the scientific justification for flow requirements as protective of fish species.</p> <p>Please see Master Response 3.6, Service Providers, for a discussion on the reason why the LSJR flow objectives would not jeopardize municipal water supply.</p>
532	2	<p>The suggested increase in unimpaired flow requirements comes at an inopportune time, on the heels of a multi-year drought, coupled with unreliable surface water supplies to contractors. At a macro level, the proposal fails to achieve the co-equal goals of California’s water policy, by apportioning additional water to address the enhancement of the ecosystem health, at the expense of water supply reliability.</p> <p>San Joaquin Valley communities are struggling with drinking water quality and water supply challenges. The State Water Board’s SED further imperils the residents of these communities, as is evident by the Board’s own analysis, which recognizes the exacerbation of current groundwater overdraft by 105,000 acre-feet per year (TAF/yr). Additionally, the plan recognizes seven basins underlying the proposed plan area, four of which are identified as critically overdrafted and on an expedited timetable for SGMA implementation.</p>	<p>Please see response to Comment 532-2.</p>
532	3	<p>Changes to the current water supply conditions make achieving success on many fronts near impossible for rural counties. Water supply for replenishment is the cornerstone of improving drinking water supply and replenishment of groundwater. The flow proposal acknowledges that the San Joaquin River Watershed does not produce enough water to meet both the existing human demands and to support a healthy ecosystem. The primary sector expected to absorb these losses is identified clearly as agriculture, noting that drinking water supplies will also suffer, yet ecosystem supply will remain constant. We disagree with the inflexible nature of this proposal and strongly advocate for consideration of the human consumers of groundwater when supplies are apportioned. History has shown that increased water flows have done little to improve the environmental conditions of fish species, yet we continue down a path that ignores the destruction to the San Joaquin Valley's economy and human health.</p>	<p>Please see response to Comment 532-2.</p>
532	4	<p>Consider the many disadvantaged citizens in the San Joaquin Valley and quash the continued seizing of the only resource that can improve drinking water quality and provide employment to many families in the affected area.</p>	<p>The State Water Board recognizes the value and importance of a safe and reliable water supply. As set forth in the Program of Implementation (described in Appendix K, Revised Water Quality Control Plan)), the State Water Board will “take actions as necessary to ensure that implementation of the LSJR flow objectives does not impact supplies of water for minimum health and safety needs...”. For further discussion regarding consideration of disadvantage communities, and the resources available to assist them as regards their</p>

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
			water supply, please refer to Master Response 2.7, Disadvantaged Communities.
533	1	Upon review of the State Water Board’s Draft Revised Substitute Environmental Document supporting Phase 1 of the Bay-Delta Water Quality Control Plan, it is evident that your staff and consultants continue to employ certain thematic approaches to water management that conflict with fundamental beliefs of the greater water user community. This approach if implemented would significantly impact our operations, the economies of Central Valley farming communities, the groundwater resources throughout the region and the both the terrestrial and aquatic environment in the Central Valley.	Please see Master Response 1.2, Water Quality Control Planning Process, regarding the consideration of beneficial uses. For further discussion related to aquatic resources, see Master Response 3.1, Fish Protection. For further discussion regarding groundwater, see Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act. For further discussion regarding the economy of the Central Valley, please see Master Response 8.1, Local Agricultural Economic Effects and the SWAP Model.
533	2	We are strongly opposed to the unimpaired flow approach as a water management vehicle. This broad-stroke metric is inconsistent with the search for progressive, collaborative, and balanced approaches that will improve ecosystems while providing security for the communities that rely on reliable water supply for both agriculture and municipal and industrial uses. (Coequal Goals, 2009 Delta Reform Act.) Furthermore, it runs counter to the California Constitutional requirement that all waters of the State be put to work to the fullest extent possible (Article X, §2).	Please see Master Response 3.1, Fish Protection, regarding the unimpaired flow approach, and the use of unimpaired flow as a management tool. Please also see Master Response 1.1, General Comments regarding the 2009 Delta Reform Act, consideration of beneficial uses and the Article X.
533	3	We encourage the SWRCB to incorporate the best available, most focused, most collaborative science available. This includes all the science that was presented as part of your 2012 workshops and the more modern work of the Delta Science Program. Local water agencies throughout California have also made substantial investments in developing science to better understand the needs of the ecosystem. For the  Stanislaus, Tuolumne, and Merced Rivers, during 2000-2008 the Vernalis Adaptive Management Plan (VAMP) was in place and studies were conducted at both low and high flows. More recently, as local agencies prepared for relicensing of both the Exchequer and New Don Pedro dams numerous progressive scientific studies were conducted. There is similar work in the Sacramento Valley. A careful analysis of this broad set of science must be done, and incorporated into the upcoming Bay-Delta Water Quality Control Plan.	Please see Master Response 1.1, General Comments, for scientific basis of the SED. The State Water Board used the best available science to develop the proposed plan amendments and in the supporting SED. A variety of data were obtained for the water quality planning process and establishing LSJR flow objectives that are protective of native fish populations migrating through the Delta and balancing water supply impacts, including, but not limited to, qualitative data from peer-reviewed published literature on topics specific to the plan area; peer-reviewed literature outside the plan area but on topics relevant to the proposed plan amendments; and qualitative data or personal communication with topic experts. In addition, the State Water Board reviewed, and incorporated where appropriate, Federal Energy Regulatory Commission (FERC) re-licensing studies into Chapter 19, Analyses of Benefits to Native Fish Populations from Increased Flow between February 1 and June 30. Modeling is based on reasonable assumptions and allows a comparative analysis between baseline and alternative conditions.
533	4	We respectfully request the State Water Board to incorporate the following into its next draft of the Bay Delta Water Quality Control Plan:  -A "functional flow" approach where flows specifically support fish and wildlife relevant to natural biological process of the species intended to promote, but in a more water efficient and practical manner than unimpaired flow. (See e.g., Delta Plan, chapter 4; Flows and Fishes Report, Delta Independent Science Board, July 2015.)  -"Non-flow" measures such as habitat and floodplain restoration to improve food web production and habitat for fish, birds, and other terrestrial and aquatic species.  -Recognize that the Central Valley is a significantly altered ecosystem with many stressors, including non-native and invasive species. Any efforts to promote and protect specific native species must also address these significant stressors. This will require cooperation and collaboration across both State and Federal agencies to press those respective agencies to take actions that support the recovery of native species by supporting reduction in predator non- native species. This includes aquatic weed control and invasive noxious plants that interfere with native species.	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, Master Response 3.1, Fish Benefits, and Master Response 3.2, Surface Water Analyses and Modeling, for responses to comments regarding functional flow and percent of unimpaired flow. Please see Master Response 1.1, General Comments, and Master Response 5.2, Incorporation of Non-Flow Measures, for responses to comments regarding non-flow actions. Please see SED Chapter 2 recognizing the altered ecosystem and natural flow regime in the Central Valley.

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
533	5	<p>We have concerns in the following areas that we believe must be studied and addressed in the next draft:</p> <p>The SED as currently written will significantly affect groundwater management as maximum groundwater pumping is assumed as a replacement for lost surface water (SED, Sept 2016, Chapter 9, pg. 9-3). It will eliminate the possibility for local agencies to sustainably manage groundwater under the Sustainable Groundwater Management Act (SGMA) without devastating family farms and local economies. The lack of surface water will limit the ability to recharge groundwater resources contrary to state policy (Water Code §10720.1(g)) and substantially increase the economic impacts to farming communities. We ask that you revise your flow requirements to prevent conflict with SGMA and to incorporate groundwater recharge opportunities to promote both local and regional groundwater sustainability.</p>	<p>The SED does not require or encourage increases in groundwater pumping as a response to reductions in surface water. The SED reflects the historical response of water users to increase groundwater pumping when surface water availability is reduced. The State Water Board acknowledges that it will be challenging, but implementation of the plan amendments does not conflict with SGMA; together they allow for integrated planning scarce water resources that does not trade impacts between surface and groundwater. It will be up to local entities to determine the precise actions that would be taken in response to the implementation of the plan amendments, with or without the future condition of SGMA. For further discussion on potential increases in groundwater pumping, groundwater recharge, and SGMA, please see Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act.</p>
533	6	<p>We have concerns in the following areas that we believe must be studied and addressed in the next draft:</p> <p>Study and include possible canal improvements and additional surface water storage to generate "new water" to help provide "functional flows" for ecosystem improvements with the least impact to farms and families that currently put this same water to beneficial use.</p>	<p>Please see Master Response 3.1, Fish Protection, for responses to comments regarding functional flow. Please see Master Response 2.2, Adaptive Implementation, for a description of the role of adaptive implementation in response to the implementation of the plan amendments.</p> <p>Potential indirect other actions that could be undertaken in response to indirect effects of the LSJR alternatives (e.g., surface water supply reduction) including aquifer storage and construction of new reservoirs are discussed in Chapter 16, Evaluation of Other Indirect and Additional Actions.</p> <p>Potential actions to increase irrigation efficiencies are discussed in Chapter 11, Agricultural Resources, under Impact AG-1 and Impact AG-2.</p>
533	7	<p>We have concerns in the following areas that we believe must be studied and addressed in the next draft:</p> <p>Careful analysis of the SED reveals that the primary beneficiary of the 40-50% unimpaired flow, (approximately 300,000 acre feet additional water in an average water year) is nearly 1,100 fall-run Chinook salmon, a non-listed fish grown in hatcheries and fished commercially in California. (Chapter 19, Figure 19-13). In keeping with the California Environmental Quality Act (CEQA) requirements, please provide an analysis of a range of alternative ways to achieve the same increase in fish population but avoiding or substantially lessening of the significant effects of the project, and evaluate the comparative merits of the alternatives. (§ 15126.6 2010 CEQA)</p>	<p>Please see Master Response 3.1, Fish Protection, for information related to the use of the SalSIM model and interpretation of its results, for justification of the unimpaired flow approach, and for discussion of the expected benefits of a more natural flow regime. See Master Response 1.1, General Comments, and Master Response 2.4, Alternatives to the Water Quality Control Plan Amendments, regarding provisions of CEQA as they relate to the alternatives.</p>
533	8	<p>We recognize that many of the actions spelled out in this letter may fall outside the regulatory authority of the State Water Board. In keeping with the California Water Action Plan and Governor Brown's September 19, 2016 letter, we ask that you work closely with the Natural Resources Agency and all impacted parties to reach a reasonable negotiated solution that incorporates the broad range of measures laid out in this letter. We must employ best available science in a collaborative and comprehensive way if we wish to benefit species recovery in our lifetimes.</p>	<p>Please see Master Response 1.1, General Comments, for information regarding voluntary agreements and collaboration with agencies. Voluntary agreements can be submitted to the Board for consideration at any time. Additionally, the SED Executive Summary, ES 3.1 Lower San Joaquin River Flow and Southern Delta Salinity Proposals, and Appendix K, Voluntary Agreements, address the minimum standard the agreements must meet for Board consideration including "measures that meet or exceed the proposed objectives and protect fish and wildlife uses".</p> <p>Additional discussion regarding the scientific basis for the plan amendments is provided in Master Response 3.1, Protection of Fish and Wildlife.</p>
533	9	<p>[From ATT1:]</p> <p>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</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Additionally, please see Master Response 3.2, Surface Water Analyses and Modeling, for additional information on the</p>

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
		<p>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.</p> <p>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.</p>	<p>calculation of unimpaired flow.</p>
533	10	<p>[From ATT1:]</p> <p>We 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.</p>	<p>For responses to comments regarding the need for improved flow in protecting fish and wildlife, and for a discussion regarding the consideration of fish predation in the SED, please see Master Response 3.1, Fish Protection.</p> <p>For a discussion regarding the State Water Board's authority related to non-flow measures and the incorporation of non-flow measures into the plan amendments, please see Master Response 5.2, Incorporation of Non-Flow Measures.</p>
534	1	<p>The business community supports a comprehensive solution to address the water supply and quality challenges in the San Francisco/Sacramento-San Joaquin Delta Estuary. Unfortunately, a comprehensive solution for California is now being jeopardized by the "unimpaired flow" approach proposed by the State Water Resources Control Board (Board) in the [SED]. "Unimpaired flow" refers to the concept of a theoretical percentage of all runoff occurring in real-time in a watershed over the course of a year.</p> <p>More specifically, the "unimpaired flow" approach will release critical water in storage and prevent the diversion of water throughout California, which will significantly affect precious water supplies for business, local communities, and the environment throughout California. This is particularly true in dry years like the last five.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Additionally, please see Master Response 3.2, Surface Water Analyses and Modeling, for additional information on the calculation of unimpaired flow.</p>
534	2	<p>The proposal will have a devastating impact on drinking water, sanitation needs, food production, the economy, and jobs for people stretching from the upper Central Valley throughout the Bay Area. The San Francisco Public Utilities Commission predicts "significant" job and other economic losses as well as "more severe and more frequent water rationing" for its 2.6 million customers. It will also have serious implications in drought years and in post-drought years when districts and landowners are trying to refill their systems and replenish groundwater. The Tuolumne River alone accounts for 85</p>	<p>This comment provides general overview information regarding the water supplied by the Tuolumne River to the RWS service area, including Silicon Valley.</p> <p>To the extent that this comment raises issues raised by SFPUC, please refer to letter 1166 to review responses to that letter. In addition, please see Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System, regarding the State Water Board's evaluation of potential reductions in water supply to the SFPUC water system service area during consecutive drought years with</p>

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		percent of San Francisco’s drinking water and 55 percent of the drinking water used overall in the Silicon Valley and by the Alameda County Water Agency. A 30 percent to 50 percent reduction in water supplies from the San Joaquin River would be extremely difficult to replace unless more groundwater is pumped. However, the Sustainable Groundwater Management Act will restrict how much water can be pumped based on basin sustainability.	implementation of the plan amendments.  Please see Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act, regarding SGMA, including intent, purpose and timeline of implementation of SGMA. See Master Response 3.6, Service Providers, regarding water for minimum health and safety.
534	3	According to an economic study prepared for the Merced Irrigation District, losses in the agricultural sector would range from \$127 million to \$231 million, decline in employment from between 587 and 970 full and part-time jobs, and a reduction in labor income ranging from \$37 million to \$59 million in the Merced area. [Footnote 1: Cardno and Highland Economics, 2016. Estimated Economic Impacts of Reduced Water Availability on the Merced Irrigation District. Cardno, Sacramento CA; Highland Economics, Portland Oregon.] The proposal underestimates the degree of economic distress that it will have on the agricultural industry dependent on the San Joaquin River for their water supplies. Main street businesses will suffer a loss of revenue and nonfarm jobs as well as local governments who will see a significant decline in revenues that support essential services.	Please see Master response 8.2, Regional Agricultural Economic Effects, for discussion of the economic analysis performed by Merced Irrigation District. Also, please see Appendix G, Agricultural Economic Effects of the Lower San Joaquin River Flow Alternatives: Methodology and Modeling Results, section G.5.4 for discussion of potential fiscal impacts to local governments.
534	4	The state’s Department of Water Resources (DWR) offered testimony at the January 3, 2017 public hearing indicating some of the shortcomings of the proposal. Amongst other comments, DWR pointed out that the proposal contains out-of-date and incomplete scientific information, contains erroneous information on water quality within the South Delta, makes unverified assumptions about its effects on groundwater sustainability and uses unimpaired flow standards not suited for real-time operations. The facts and science used to develop the proposal are unsupported and therefore should be set aside.	Please see Master Response 1.1, General Comments, for responses to comments regarding the scientific basis of the SED. The State Water Board used the best available science throughout the SED. Modeling is based on reasonable assumptions and allows a comparative analysis between baseline and alternative conditions.  Please see Master Response 1.1, General Comments, for responses to comments about the scientific basis for the development of LSJR alternatives and additional information about program-level analysis and substantial evidence. Please see Master Response 2.1, Amendments to the Water Quality Control Plan, and Master Response 3.1, Fish Protection, for additional information regarding the scientific information used to inform the plan amendments. Please see Master Response 3.4, Groundwater and the Sustainable Groundwater Act, for information regarding groundwater sustainability. Please see Master Response 2.1, Amendments to the Water Quality Control Plan, and 3.1, Surface Water Hydrology and Hydrologic Modeling Using the Water Supply Effects Model, for responses to comments regarding calculation of unimpaired flow and compliance.
534	5	We believe the Board should abandon this flawed approach and instead encourage parties to develop voluntary agreements as called for in the California Water Action Plan and reiterated by the Governor in a September 19, 2016 letter to Chairwoman Marcus.	Please see Master Response 1.1, General Comments, for information regarding voluntary agreements and collaboration with agencies. Voluntary agreements can be submitted to the Board for consideration at any time. Additionally, the SED Executive Summary, ES 3.1 Lower San Joaquin River Flow and Southern Delta Salinity Proposals, and Appendix K, Voluntary Agreements, address the minimum standard the agreements must meet for Board consideration including “measures that meet or exceed the proposed objectives and protect fish and wildlife uses”.
535	1	Our business has seen and survived times of drought, recessions, falling commodity prices, government regulations, drastic weather, and large decrease in farm producers; but none of these obstacles can compare with the devastation that will occur due to the proposal by the water board to diver water away from our communities. The consequences are far reaching -- as agriculture touches many non-ag industries and small business -- from furniture stores to trucking, from non-profit to school functions such as FFA and 4H.  The effects of such proposal more than likely would be severely harmful to our business resulting in massive layoffs and financial uncertainty.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.



**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
535	2	Local water control is best served by those who know our area and residence of our county. Turlock Irrigation District serves us well and by undermining their authority and expertise in the water business will cost us, the residence, and business's, of the greater Central Valley.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
535	3	The answer to our water problem is not control but quantity. As a tax payer, businessman, employer, and resident, I don't understand why more storage is never discussed. The answer to the problem is the same -- more storage!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
535	4	Before your board votes to harm our agricultural economy and more specifically our business, our drinking water and community, please work with the local water districts (many of whom have peer-reviewed, most recent science) to look at non-flow measures that can accomplish realistic goals for the environment and the Bay-Delta before considering a flow-centric approach.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
536	1	<p>I wish to express my support for SWRCB proposals presented in the 2016 Bay-Delta Plan Amendment and SED that would have the effect of re-allocating future California surface water flows away from water uses that are substantially associated with dairy/livestock feed crop-related agricultural production in the San Joaquin Valley (as well as flood-irrigated agricultural rice production in the Sacramento Valley). I support a robust re-allocation of surface water flows that would promote native fisheries protection and restoration in the Bay Delta, the San Joaquin River (SJR), and the three tributaries to the SJR (Tuolumne, Merced, and Stanislaus rivers) that are identified within (and which are the foci of) this Bay-Delta Plan Amendment and SED. I also wish to express my support for even higher re-allocation targets proposed by the SWRCB that would promote heightened fisheries protection and restoration in the project area.</p> <p>The rationale underlying my support for such a position is documented in the attached complaint that I previously submitted to the SWRCB and CalEPA on September 29, 2016. (In short, I argue that it is unethical to further jeopardize native fisheries in California in order to sustain allocation of surface water flows toward agricultural uses that are demonstrably wasteful and unreasonable.)</p> <p>Please incorporate these comments and the attached complaint [ATT1] into the formal administrative for this proceeding. I wish to note for the record that all of the analysis upon which my September 29, 2016 complaint is based can be located for download at <a href="http://wumu-wuru.my-free.website/">http://wumu-wuru.my-free.website/</a>.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
536	2	[ATT1: Complaint letter to SWRCB re: water use of specific individuals.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
538	1	Our fine State has developed a conscience and is going to try to undo portions of the existing water delivery system to the purported benefit of fish and Delta balance. You should realize that you are asking for this on the backs of the citizens of the Central Valley and none others elsewhere. You are proposing to proprietarily take water that was promised and delivered in good faith for all this time. My husband and I will personally be devastated if in fact we lose our 18 acre ranch due to the ramifications of this plan. Agriculture is the backbone of this region and you know this.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
538	2	This project is far too ambitious and over reaching in its scope. Not only will this not revive the salmon or the rivers it won't help any of the missing elk, grizzlies, and waterfowl that were also doomed because of man's incursions. The biggest curse of all was the success of	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		<p>the human population and that doesn't look like changing any time soon. I urge you to work with the stakeholders on this issue. You cannot hope to reverse the long years of problems overnight and shouldn't vote to do so. Go back to the drawing board and ask for help from the people in our area so that we can eventually be proud of our achievements, done together for the benefit of all involved.</p>	
539	1	<p>I am writing regarding all of the extra water we have right now in the valley. We want to make sure this water stays within our boundaries. This will give farms, cities, and the general public water for use here when it came from. Don't let this water go on out to sea when it really can be used in our valley now.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
540	1	<p>The City of Ripon has strong concerns with the conclusions in the draft Substitute Environmental Document (SED) for the proposed Water Quality Control Plan for the San Francisco/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan).</p> <p>Like most communities in our region, Ripon relies solely on groundwater to serve drinking water to a population of over 15,000 residents through approximately 6,000 water service connections. This groundwater is a diminishing resource that is subject to overdraft and declining water quality and the SED conclusions further jeopardize our water source.</p> <p>The state's proposal hypocritically suggests that farmers will make up for lost access to surface water by pumping more from already overstressed aquifers. That makes no sense, especially at a time when Legislature already has demanded local entities form Groundwater Sustainability Agencies and develop Groundwater Sustainability Plans. Ripon resides in the East San Joaquin Subbasin, a groundwater subbasin that California Department of Water Resources has defined as critically overdrafted. Any additional impact to surface water resources anticipated by the SED will only exacerbate the current state of groundwater in our region.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
540	2	<p>The "significant but unavoidable impact" cited in the Plan's "Groundwater Resources" chapter as the results of its implementation cannot be dismissed. I encourage you to convene a meeting with local water resources managers, local agency staff, and local elected officials to work on commonsense solutions to our water resource challenges.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
542	1	<p>Coming from a farming family, I find it abhorrent that you the government who know nothing about what our water produces wishes to take water away from farmers. Our farmers provide jobs for many different kinds of small business. They provide jobs in their farms.</p> <p>There have been agencies working on restoring habitat for the fish. You need to work with these people instead of making the blanket rule of stripping water away from our farmers. More water in the rivers does not mean more fish will show up. Duh!</p> <p>You liberals are ruining our state and country.</p> <p>Keep your hands off our water.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
543	1	<p>It has been proven that more water does not equal more fish. The water being sent downstream to save fish is currently killing more fish in the reservoirs being depleted. We are struggling to save water in our homes and yards to keep wells from running dry while the government is flushing valuable water away. Humans are more valuable than fish.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		Protect them first. Don't raise flows any higher in the Stanislaus River.	
544	1	We are disappointed that the water board is considering a larger release of water down the rivers in the Central Valley. We have just had some small relieve from the currant drought the state is dealing with. Water as you know is the life blood of not only agriculture and its labor pool but the other industries, cities and general population of these areas. These areas not only help feed the population of the USA but the world also. We not only produce an abundance of food but do it at a price that is an huge economic advantage to our population but also that of our trading partners. Agriculture products also are a big part of the exports that help keep our balance of trade at the level it is. We strongly request that you not change our rivers flow requirement as the economic impact would be devastating to our economy and our citizens.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
546	1	Our drinking water comes from the Stanislaus River please do not release excess water for fish flows. I strongly urge the water board not to go through with their water plan.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
547	1	I would like to comment on the revised Bay-Delta Plan Amendment & SED.  The proposed medium of 40 percent of unimpaired flow to the San Joaquin River from it's tributaries: the Stanislaus, Tuolumne and Merced Rivers from Feb-June is an "excellent" idea. This is a compromise that should work. The health of the southern Delta is critical to the environment and farming in that region. The Bay-Delta ecosystem has been under stress due to a reduced inflow of fresh water for a long time. The B/D Plan Amendment & SED as proposed would be a positive step in reversing the degradation of that region.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
548	1	Last year with even less release of water, we put warm water into the rivers due to the low level of the reservoirs. This resulted in killing most of the eggs from salmon and trout. You say this extra water flow is needed to protect the fish but, it's actually making it worse. Please quit going for these fast fixes that only do more harm and are no help for fish, people or agriculture.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
549	1	I am writing to strongly support your proposal to increase flows in the Tuolumne, Stanislaus, and Merced Rivers, to keep more water in the rivers. Our family has lived within 5 miles of the North Fork Stanislaus River for almost 40 years. We've heard stories about how miners during the Gold Rush hauled wagonloads of fish out of [the North Fork of the Stanislaus River] river to feed the workers. Now sportsmen consider themselves lucky to come home with a dinner or two of planted trout. Times have sure changed!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
549	2	During this drought we have been amazed, when we've left the mountain and driven through the foothills and valley, to see that new vineyards and orchards are being planted, some on grazing land that we'd assumed was too dry for farming. Our conclusion is that agriculture will use as much water as it is allowed to. It has a thirst that can never be satisfied, it seems.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
549	3	But our water needs to be used for many things, cities, fish, industry, as well as farming. it also needs to be used wisely today so options are kept open for future generations. Using it all up for farming or for industry and not keeping enough to maintain fish and other wildlife is like spending all our capital now and not leaving any for the unknown future. Maintaining what God has given us, in the most natural state we can now, is wise stewardship of what we've received from past generations; it preserves options for dealing	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
		with what the future will bring.	
550	1	<p>My suggestion would be that you suspend any increase in water to the valley farmers till they can demonstrate that 80% of their crops are not being sold over seas. The last estimate that I heard was that 800,000 acres of nut trees have been planted last year. With 1.1 gallons of water being used for 1 almond. The subsidence in the valley is severe in the valley, primarily for profit of large Agri Business, with some closely held corporations profiting as well.</p> <p>With all the calls for "Food Grow where Water Flows", ignores the communal resource of ground water is being pumped without respite to benefit the bank accounts of the large Agri Business, not the American consumer, which doesn't consume the harvest of all these nut trees. Let alone, that all the water that is pumped is not in any way regulated or taxed. If every gallon had a 10¢ surcharge for crops that were not consumed within the United States, crop planting would take a turn for the better, more sustainable water usage would be the result.</p> <p>Please don't let large Agri Business have an undue say in water allocation, all they care about is the next quarterly report, not the next generation that their reckless usage will have profound implications for.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
551	1	<p>First of all, restrictions on residential water use, and not commercial water use, is absurd! More business' waste water, in a much larger capacity, than residents do!</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
551	2	<p>Somebody needs to address the millions, repeat millions, of acres of nut trees that are being planted throughout the state. It is incomprehensible that no-one is concerned about the water needs of these newly planted orchards. It is a well-known fact that nut trees require the most water of all fruit/nut trees, and that almond trees need more than all the other nut trees. Almond trees are, by far, the type of trees that have been planted the most.</p> <p>This all makes NO sense, in a state that is supposedly in a serious drought!</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
552	1	<p>I am definitely opposed to your plan to increase unimpaired flows on the Stanislaus and other rivers. Jobs will be lost, valuable farmland will be ruined and property values will go down.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
553	1	<p>People and food should always have priority over misconceived notions that we are necessarily in charge of saving all species of fish and insects. While no one would wish to intentionally harm the environment, most of our current policies are misguided at best and ferociously malignant at worst in their attempts to hurt farmers and the Valley.</p> <p>Let's keep the water here and see if that improves the food production and employment levels in the Valley. Why not err on the side of food, people and farmers?</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
554	1	<p>Each of us is dependent on water from the rivers that flow through our region. Without that water, we live in a desert instead of the world's most fertile valley. Surface water recharges our groundwater and helps reduce nitrate and salt issues in our soil. I recently attended the December 19, 2016 State Water Resources Control Board (SWRCB) hearing in Merced and</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
		<p>watched with disgust their reaction to our many community members' comments regarding the Board's current Bay Delta Plan. They were clearly just going through the motions. The Board was unwilling to genuinely listen to a community that could lose up to 25% of its existing surface water under this plan. The potential economic losses equate up to \$234 million for Merced (Merced Irrigation District economic impact study), and \$1.6 billion for the Turlock and Modesto area (Turlock and Modesto Irrigation Districts economic study). Many of us feel our state has reached a new low in its ability to apply common sense when faced with difficult decisions.</p> <p>The discussion that day should have been about maximizing storage capabilities during wet years and how to implement the best available science to restore the salmon population. Increasing reservoir capacity will increase economic opportunity for a region where 50% of the population receives Medi-Cal services. Instead, the discussion was about decreasing opportunity, further exasperating economic and social issues. We need leaders who have the foresight of past generations, who view our region as a place of abundance not scarcity, who choose equitable compromise over unaccountable dictates.</p>	
554	2	<p>Another proposal, the Twin Tunnels project, will divert Sacramento River flows to southern California before the water reaches the Delta. This is why the SWRCB is trying to reallocate--steal--our water. The Twin Tunnels project will not move forward without approval of the Bay Delta Plan. Both proposals are driven by an unholy alliance of Delta farmers, environmentalists, the sports fishing industry, and southern California politicians. The Governor seems willing to sacrifice our region's water needs for the benefit of the rest of the state. The risks far outweigh the reward. It threatens our state and country's food supply as well as the economies of the counties being asked to give up their water.</p> <p>While some call the Twin Tunnels project bold and innovative, taking water from the north and giving it to the south has been happening for over 70 years. Bold and innovative is what Israel is doing. One of the driest countries in world, mired in daily conflict, Israel is producing more water than it needs through new desalination technology (Scientific American, July 2016). This groundbreaking process removes salt from the Mediterranean Sea, making the water potable. A desalination plant in Carlsbad was just completed and will supply the San Diego area with 8-10% of its water needs, using the largest, drought-proof reservoir in the world, the Pacific Ocean. This plant was built for \$1 billion and it will pump millions of dollars into the local community, as it has created hundreds of permanent jobs (San Diego Tribune). For the cost of the Twin Tunnels project (over \$14 billion), we could build 14 of these plants, essentially solving our water problems.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
554	3	<p>This is not just a farming issue; it affects every single one of us. Less water equates to less employment, which equates to less economic activity in all sectors of our economy. We are just beginning to recover from the Great Recession in which housing prices declined 25-50%; that was a painful yet temporary condition. This plan and its resulting impact are permanent. We do not want to return to an economy similar to that of 2009. This is not hyperbole. Farmers barely have enough water now, and it is only because they pump groundwater to offset the lack of surface water. With the new groundwater regulations that will soon go into effect, farmers will run out of options. If you think this is not your problem, consider what Dr. Steven Gomes, the Merced County Superintendent of Schools, stated at the December 19th hearing: "20,000 students attending schools in Merced County are dependent on school district wells located on their campuses for drinking water, restrooms, and sanitation for cafeterias. Under the Board's proposal, I am confident these wells will go</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
		<p>dry in the near future.” Dr. Gomes cited the dramatic decrease in the well water level supplying LeGrand Elementary School, which has dropped 103 feet in 11 years! If this plan moves forward, school districts and other government agencies in neighboring counties may face similar unintended consequences. Why would we consider a plan that the Board admits would cause “significant and unavoidable” economic damage?</p> <p>I am writing about this because, as the Superintendent of the Merced Union High School District (MUHSD), I have a fierce desire to make sure the 10,000 students in our district are afforded the same or better opportunities as previous generations. Recently, our state has made much needed funding changes to education. As a high-performing and high-functioning district, I applaud the governor for being a champion of funding equity—districts now receive more money for students in challenging circumstances. This extra funding provides the 76% of our student body living in low-socioeconomic circumstances support and opportunity that just a few short years ago, seemed unattainable. Fundamental change is creating fundamental equality in the educational system.</p>	
554	4	<p>With the SWRCB’s plan, a wrench is being thrown into what should be exciting and optimistic times in education. The current proposal severely impacts education in our region; a region that is already struggling economically. Less water will amount to declining enrollment due to the inevitable decline in employment opportunities. Declining enrollment will amount to decreased funding. When districts have declining enrollment, they cannot maintain existing programs that support students or keep pace with statutory benefits, and step and column salaries. We are dependent on water for economic growth. Our state asks our schools to focus on equity of opportunity and the narrowing of achievement gaps. We are all making great progress, and we ask our state to not make an intentional decision that will impede or negate that progress.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
554	5	<p>We are small players in the state's political machine. We must step up to this challenge and work together to see that “Dust Bowl” remains a reference to beer in our area, rather than a reference to the landscape of our region. The MUHSD and its Board of Trustees is committed to bringing attention to this matter and ensuring that our community’s voice is heard.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
555	1	<p>Your plan to increase flows in the Stanislaus and other rivers is pure lunacy! Build a desalination plant for LA/San Diego. Stop scheming to take our water.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
556	1	<p>We stand with the Modesto Irrigation District and the Turlock Irrigation District in opposing the state proposal regarding redistributing local river waters.</p> <p>We also firmly believe the recent report that increasing the water flow does not necessarily enhance the salmon production. Food for people is far more important.</p> <p>Please stand "firm and consistent" in your opposition to the state's proposal.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
557	1	<p>My email is to oppose the State Water Resources Control Board to send 350,000 acre-feet of water out to sea. This is enough domestic water for 2 million people each year and 100,000 acre-feet of water for farmland.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
557	2	We need a comprehensive solution with other agencies, and local stakeholders to fix California's water storage/release, habit's, domestic use, and farmland.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
557	3	Science has proven we can fix the struggling fish populations by control predators, restore habitat, and utilize functional flows.  Yes this year 2016/17 we have too much water, but letting the water out when we don't I oppose.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
558	1	In this day in age, I can't believe that we haven't figured out how to save more of this water that we are just letting go down stream! Your plan to increase flows in the Stanislaus and other rivers would just make the problem worse. Why are we not working to help our state, agriculture and citizens?	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
559	1	The regulations regarding water flow that you're considering would be devastating to our communities from the San Joaquin Valley to the Bay Area. We are third generation farmers and have borne the brunt of the pain from the last five years of drought. We (my husband, myself and our sons) are barely hanging on because the water "cuts" prevented us from farming all our farm ground which in turn lowered our income to the point that we are worried we may have to sell our farm.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
559	2	Science clearly shows that decades of releasing water to the ocean has failed to stop the decline of threatened fish populations. And while increasing water flows won't help fish it will devastate local communities from the Northern San Joaquin Valley to the Bay Area. These regulations are opposed by schools, health departments, farmers, cities, economic development officials and more. The truth is there is science to back up the premise that there are better ways to help the fish populations such as control predators, restore habitat and utilize functional flows. We need a comprehensive solution that considers more than just water.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
559	3	Sending so much water to the ocean may be the easiest solution for you but for those of us whose livelihoods depend on this water it is vital to our survival. Imposing a one-size-fits-all regulation will hurt millions!!!! Our family implores you to reconsider your stance on these regulations and find a solution that benefits all of us, including the endangered fish.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
560	1	As we have seen in recent years of drought with the drawdown of New Melones Reservoir, the river flows required today are unsustainable. When we rely heavily upon these waters for ag use, but at the same time release more water than river flows would naturally allow, we draw down our reserves to irresponsible levels that affect businesses, surface dwelling animals, groundwater levels, recreation, agriculture and tourism.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
560	2	One of the issues that we are already seeing from low water levels, though it is not limited to areas around the Stanislaus River, is land subsidence. By reducing storage and access to surface waters in times of drought, farmers are being forced to pump from wells. The pumping rates that have been placed on the land have in many cases caused land to sink in amounts measured in feet in some areas. Permanent damage to our aquifers is the byproduct of this extra pumping of groundwater. We can refill our reservoirs or even build them taller, but we cannot rebuild our aquifers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
560	3	I would prefer to see more monies and efforts directed at researching the impacts of predation on young salmon and controlling invasive species such as striped bass. Their abundance and impact on our waterways is easily seen after just a short time spending time watching our rivers. We could remove the dams from our waterways, but unless we did something to stop aggressive predatory animals like striped bass, it would not change a thing for salmon.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
560	4	Our water is more precious to us than we can put a price on. But if we continue to use and advance bad management practices, there will be no water left at all. We have created a society that relies on our storage of water and has been built around the infrastructure that has been built to support it.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
561	1	In my opinion, the state needs to build more dams and watersheds to collect water in times of need. There are far too many residents relying on the very few watersheds today. California needs to collect more water from other sources besides the Stanislaus River.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
562	1	The proposed Substitute Environmental Document (SED) would require increased flows from three salmon-bearing tributaries to the San Joaquin River: the Stanislaus, Tuolumne and Merced Rivers. We [City of Petaluma] strongly support these increased flow objectives.	Please see Master Response 1.1, General Comments, for responses to comments in general support of the plan amendments, a specific percent of unimpaired flow, or an LSJR alternative.
562	2	The mixing of freshwaters from the Sacramento and San Joaquin rivers along with our local rivers and streams has historically created a place of rich biological abundance in San Francisco Bay. The state's complex system of water movement and use has left the San Francisco Bay a depleted estuary - with nearly 50% of the freshwater it would otherwise receive taken out of the system. Numerous scientific reports have confirmed that critical fresh water flows into San Francisco Bay have been drastically reduced, threatening the survival of fish and wildlife, degrading water quality, and shrinking our beaches and marshlands. A healthy San Francisco Bay is vital to the economy of the region. The San Francisco Bay is at the heart of this economic engine, providing great physical beauty while sustaining the resources and lifestyle which have made the region such a desired place to live.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.
562	3	We urge the State Water Board to approve the proposed flow objectives and to move ahead with Phase II and III of the Water Quality Control Plan update in order to increase the annual freshwater contribution from the San Joaquin River and improve conditions in our fresh water-depleted estuary.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. For further discussion of the State Water Board's independent proceedings for the protection of beneficial uses in the Bay-Delta and tributary watersheds, please see Master Response 1.2, Water Quality Control Planning Process.
563	1	I am against your proposal to increase unimpaired flows in the Stanislaus and other rivers. Stop the southern water grabs!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
564	1	Implement a comprehensive science-based water plan that includes managing each watershed (including groundwater) as a unified whole and upgrading the Delta levee system.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
564	2	Fully protect all water sources from contamination and guarantee sufficient water for the basic human needs of drinking and sanitation.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
564	3	Motivate efficient, sustainable, safe use of water and hold all users accountable for their consumption; implement and enforce regulations regarding groundwater use including full	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.



**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		usage documentation.	
564	4	Ensure allocation and management of water to sustain ecosystems, fisheries, recreation, and endangered species.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
564	5	I am concerned about the viability and health of fish, wildlife, and plant populations that depend on fresh, cool, flowing water in the Sacramento-San Joaquin River System. This includes both resident and migrating species. The entire river system drainage should be managed as a complete ecosystem. Its health depends among other things on the vigor of the salmon populations. These populations need to be boosted. The system is threatened by salt water intrusion into the Delta and by algae blooms that are toxic to people, plankton, and wildlife. In much of California, including Santa Clara County, human needs for clean, safe water depend on a healthy Sacramento-San Joaquin system.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
564	6	<p>The 2010 State Water Board report titled Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem stated:</p> <p>"In order to preserve the attributes of a natural variable system to which native fish species are adapted, many of the criteria developed by the State Water Board are crafted as percentages of natural or unimpaired flows. These criteria include:</p> <p>-- 75% of unimpaired Delta outflow from January through June;</p> <p>-- 75% of unimpaired Sacramento River inflow from November through June; and</p> <p>-- 60% of unimpaired San Joaquin River inflow from February through June.:</p> <p>Therefore, I urge you to set the flow at the needed levels of approximately 75% for Delta outflow, 75% for Sacramento River inflow, and 60% for San Joaquin River inflow during the specified months.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
565	1	<p>My email is to oppose the State Water Board regarding the proposed Plan Amendment and the Substitute Environmental Draft (SED) of the Bay-Delta Water Quality Plan.</p> <p>You, State Water Resources Control Board want to send 350,000 acre-feet of water out to sea. This is enough domestic water for 2 million people each year and 100,000 acre-feet of water for farmland.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
565	2	As a California voter and farmer there needs to be a comprehensive solution with other agencies, and local stakeholders to fix California's water storage/release, habit's, domestic use, and farmland.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
565	3	Science has proven we can fix the struggling fish populations by control predators, restore habitat, and utilize functional flows.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
566	1	Please do not take Delta water to fill L.A. swimming pools. Leave our water alone.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
567	1	As a resident of Stanislaus County, I'm for not just conserving water but conserving a lifestyle that includes farming, fishing and water sports. Seeing the ruin of the last 5 years from drought, with the eroded walls of the nearly dried up lakes and dams, I can't see the	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		value of releasing much needed water from our area.	
568	1	We need to save our precious water. We will always be in a state of drought in California. We take showers with buckets in them to re-use water and watch water flushed down the river. NOT OK.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
569	1	<p>I am opposed to an increase in unimpaired flows on the Stanislaus River - which would hurt agribusiness, the local economy, home users and deprive thousands of recreational opportunities.</p> <p>Your plan has generated widespread opposition in this region. It would take water away from agriculture, homes and recreational users in an unscientifically supported attempt to benefit fish and the make up for what Gov. Jerry Brown's twin tunnels project would remove from the Delta. The plan could have devastating economic impacts on agribusiness and related industries in this region.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
569	2	There needs to be other alternatives to always draining our lake and pumping our water elsewhere. There are thousands of people with lives and businesses in this area that need the revenue from our lake and river. People have paid millions to live in this area due to these recreational areas.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
569	3	Use other means that are viable to combat the loss of fish without draining one significant water way.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
570	1	<p>The State of California is abrogating its fiduciary obligation to the citizens of this state by implementing this insane project. The function of the state is to provide for the health and welfare of its citizens. This plan will decrease that obligation. As we all know there is a dearth of water for the south half of the State affecting the health and welfare of half of the population due to global warming and climate change. This plan will reduce the flow of water to useful purposes that increase the production of goods and services, thereby reducing the standard of living which is the economic basis for providing health and welfare of the people. Anyone that has taken a basic course on economics would understand that State production is the basis for standard of living, health and welfare!</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
570	2	If the goal of this ill-conceived plan is to increase king salmon production, obviously it would be most economic to build a king salmon farming facility close to the bay and reserve the water for other production. That would provide for a king salmon fishery in the Bay at much lower cost.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
570	3	<p>I suspect that the promulgators of this plan would like to return the state to some time in the past that they have chosen to find appealing. The date is not 1922. I would ask those proponents what their selection of time period they prefer to return to, and their justification for choosing that time period. Mesozoic period perhaps? Interglacial warming? This plan is also based on the idea that California is "golden" and has so much unlimited wealth that it can spend the resources of the people to build Hanging Gardens, Pyramids, Ziggurats to the skies, among other wastes of resources renowned through history by the elitists and wealthy. The rest of world doesn't care anymore what California does! China has raised the standard of living of millions from poverty to middle class without this kind of elitism and any concern of "What is California doing?" To put it bluntly, the poor don't give a shit. They would rather see increased production and standard of living. After all, who eats</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		salmon? It ain't the poor or middle class!	
571	1	California is fortunate to currently have a winter rainfall well above normal and indeed exceptional. Normal logic would dictate that this opportunity to fill our reservoirs should be taken without reservation. For whatever reason, most likely political, you have chosen to ignore the obvious and pursue a flawed plan under the guise of fish preservation.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
571	2	Not allowing reservoirs like New Melones to be filled to capacity when there is more than enough water available is criminal. Your actions of ignoring input from the water districts and affected communities clearly indicate that the needs of California are second to the demands of special interest groups' pressure to grab as much of California's water as they can, to profit from land development and other private projects. Unfortunately, Gov. Jerry Brown seldom acts in the interest of the people of California. He usually caters to the special interests and political associates. It is time now to take advantage of the water we are receiving and do the right thing. Fill our reservoirs!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
572	1	The Board's adoption of strong new flow standards is the single best action that can be taken to restore Central Valley salmon and steelhead runs.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.
573	1	I have been going to New Melones for 30 years and recently the management of the water in that lake is so poor it borders on criminal. Unimpaired flows is irresponsible and from what I can tell, does not serve the greater good. I request that you do what is necessary to reduce the outflow of this lake and do not allow the storage to fall below 60% of capacity at any time. I favor a sensible, balanced water management plan for the Stanislaus River that fairly distributes this precious resource.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
574	1	The water flow on Central Valley rivers has been, and is being, mismanaged for at least a decade! Our farmers should come first, then the fish, and recreation is also important. The water levels in our reservoirs are always feast or famine! The Stanislaus River is full of trash! How is that good for us or the fish? Let's clean up the river and STOP the madness. And why isn't our canal system used more efficiently? Fill them up and use them when it rains so much! Prayers for our river and those in charge. Please listen to our community and act on these concerns! They are important.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
575	1	Your proposal to increase river flows in the Stanislaus, Tuolumne and Merced will have a dramatic and negative impact on the local economy and the environment.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
575	2	There is no scientific data that the increased flows positively impact the fish. In fact, there is a lot of information to the contrary that the habitat for the fish has already been destroyed.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
575	3	Please place people, their livelihood and the economy of the landowners and the farmers first!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
576	1	Our farmers grow food for people all over the globe, including my own wife and three boys. My friends are farmers. It's simple math. No water, no food. No food, no people. It would be nice if we could restore things to the way they were before all this development. But that's a fantasy. The world's population is always growing, and it's up to us to make wise and proactive water management decisions now, so future generations have what they need to survive. Let the Bay Area and SoCal worry about their own water. Let's choose to be wise stewards of what God gave us. More reservoirs now.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
577	1	I am opposed to your plan to take more water from the Stanislaus River. People need water where you are taking it from. We need a fair distribution of water for all.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
578	1	Your plan could divert more than 300,000 acre-feet of water away from agriculture in the Stanislaus, Tuolumne and Merced river basins. One estimate suggests that as many as 240,000 acres could be fallowed in the region; thousands of jobs in farming, trucking, food processing and related industries would be lost.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
578	2	Releasing water between February and July, as your proposal suggests, also forces electric utility companies to produce unnecessary hydroelectric energy during a non-peak demand period. This is irresponsibly inefficient.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
579	1	Save the salmon; this is a no-brainer. Yes on salmon.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
580	1	<p>I was present at the Modesto public hearing on December 20 2016 for 3-plus hours, and have spent additional hours viewing the 9:46 minute video online. Thank you for that opportunity, as it served to cement my support of your plan.</p> <p>I found it increasingly noteworthy that opponents did not address what is to me a very fundamental point: that it is precisely their (not all of course, but most) land-development, management and water-use practices that has led to the predicament we face today. Plus, the addition of cultivated acreage during the current drought has exacerbated the already existing problem.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
580	2	I agree completely with . . . the fact of over-allocated water and the corresponding need for far greater agricultural water-use efficiency.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
581	1	People trump the fish by federal legalities. That's [why] I do not agree with your plan to raise river flows.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
582	1	I understand that begging and pleading for this measure to be voted "no" will go unheeded. But that is where I now speak up. You people on the Board, you are voted by the people of the state to be a member of the board. Your job is to represent the people of the state, not for us to bow down to you as your servants. We are not slaves to you. It is already known that the amount of people protesting and demanding a "no" vote already count more than those pushing for a "yes". It is not your job to go and vote against the people in favor of one environmental group. It is your job to vote according to the people. Far more people have spoken against this amendment than for it.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
582	2	It has been noted that no other options have been considered. This is wrong. Other options should be included for the people to choose a fair compromise. Other options, such as properly draining the overflow of the lakes in question for 5 years only after the known cycle of "El Nino" and "La Nina" weather cycles. We have a known 20 year flood and drought cycle connected to those weather conditions and phenomena, why was it not proposed that the water overflow be accepted for 5 years after a known "El Nino" year, and then proper water be delivered to the residents and farmers for the remaining 15 years until the next "El Nino"?	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
582	3	Why was it not proposed a cap on new buildings in the San Joaquin Valley? It should instead be proposed that a cap be put on all new buildings in the San Joaquin Valley. The San	Please see Master Response 1.1, General Comments, for responses to comments that either make a general

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		Joaquin Valley does not need 1 million new houses or buildings in the next 20 years. It should be proposed that a building limit be put on the San Joaquin Valley.	comment on the plan amendments or do not raise significant environmental issues.
582	4	<p>We are aware that you are ultimately humans who are making this decision. Be aware that your vote to approve this measure will directly affect more than 20 million people. We know that Blue Diamond Growers are in line of the Stanislaus, Tuolumne, and Merced Rivers. We also know that Blue Diamond is the largest producer of almond milk product, which is a known safe alternative for people with lactose intolerance. We know that such a decision to take the water to grow the food needed to keep people alive will increase the price of food by another 200%. We are also aware that Hilmar Cheese and all of the dairy producers are along the waterways in Merced and Stanislaus counties. We know that Hilmar Cheese is the largest producer of whey products for baby formulas. If you are the parent of a child in the last 20 years, or are looking to become a grandparent in the next 20 years, your babies will still depend on baby formula to stay alive. A vote for this measure will result in the cost of baby formula to increase by \$2.00. This is already too much to people needing to choose between affording the cost of food to feed their family or pay rent. Your vote will directly increase the amount of homeless people by 20% as they choose to buy baby formula to stay alive instead of pay their rent.</p> <p>Are you sure you want to be the people responsible for the direct increase of the homeless by 20%? We bring up the Klamath River Basin, and the result of several thousand people being put on government assistance and welfare due to the loss of both jobs and high food costs as a direct result of the water decision that failed to "save the fish"</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
582	5	<p>Your vote is for the people. If the people say "no", you must vote "no".</p> <p>We are aware that you have already received your payment and perks from the environmental companies. You have already been paid, despite the protests of the people.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
583	1	The lakes are already extremely low. We are still in a drought and we cannot waste our precious water to help the salmon. They will get down stream just fine, but we will starve if we don't have any water to water our food! Close the dam!!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
584	1	As a lifelong Californian and sportsman, I am concerned about water and it's management in our world. Before Europeans arrived in our state there thrived a whole system of wildlife which took advantage of an environment which took millions of years to develop. We have to honor that fact by allowing enough of the resources of our state to maintain that system, in perpetuity. If we find we need more water, we should look elsewhere for it.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
585	1	Saving fish over saving farming just doesn't make good sense.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
585	2	Spending money to send Valley water anywhere is irresponsible. What happens when there's no water to send? Let Southern Cal spend money on desalination, to cure their water problems.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
586	1	As a farmer, I want the security of knowing the state still supports Ag in California. The world population is always growing and people need to eat to live. Your river flows plan endangers our ability to feed people.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
587	1	Healthy wetlands support aquatic diversity and protect our shoreline in times of increased flow from the bay and rising sea levels. Increasing the unimpaired flow of fresh water from the San Joaquin River to the Delta and the bay is an important part of improving and maintaining the health of the Bay.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
587	2	In recent years I have learned about the importance of taking a holistic view of the environment that focuses on the sustainability of a complete ecosystem. I would like to see the Bay Delta Plan incorporate this knowledge. I understand that is the goal of the plan and that Board is working hard to balance the needs of an increased number of stakeholders - agriculture, cities, the fishing industry and the river 's ecosystem.  All of these stakeholders are important. Historically agriculture and cities were the main recipients of San Joaquin water. Now that there have been numerous scientific studies about the decline of the salmon and the importance of wetlands the river's health and the fishing industry should be included in the plan. According to the studies half of the natural flow making it to the Bay would go a long way toward salmon recovery and wetland health. I urge you to implement the option of a 50% unimpaired flow for the San Joaquin River.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
588	1	Maintaining the balance between agriculture and ecology is a challenge. Still, while crops and even orchards may come and go, especially from areas for which they are ill-suited, the fish population and the general ecology are more fragile, less easy to replace.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
589	1	We need our water!	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
590	1	In this instance, the scientific method has been supplanted by the political method. The supposition that increased flows result in healthier fish populations is not founded in science.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
591	1	I am writing to urge you to heed the findings of the Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem report and require that 60% flow be maintained in the San Joaquin River.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
591	2	We humans are having a devastating impact on many aspects of the environment, including the salmon population. We must do what we can to offer this species a chance to rebound. Besides being an iconic species and a symbol of a wild, untamed America that many hold dear (at least as an idea), these fish also are an important food source for many of us carnivores and help transport nutrients upriver from the ocean. I am so proud of my adopted state for leading the way on so many environmental protections and initiatives, and for vowing to stand firm in these protections regardless of the direction taken by the federal government. California has been, and will continue to be, an environmental leader. Let's take the lead now on giving the salmon a chance of survival and keeping the San Joaquin River Delta healthy.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
592	1	I understand there are many demands on the Bay-Delta water supply and you can't satisfy everyone. However, I think taking half and leaving half for nature preservation is a fair bargain. As you know, agriculture uses the vast majority of this water and agricultural water use efficiency is far lower than it could be. As long as we provide cheap plentiful water, there is little incentive to conserve. I support some sort of temporary compensation for farmers so that they can adapt to reduced supply/increased costs. I don't support never-	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		ending subsidies, which is what cheap water ultimately is.	
593	1	<p>As a former executive director of an environmental education museum, I know how important nature is to humans. We are part of nature. We depend on all the cogs of the wheels working to bring us fresh air, clean water, wildlife, breathing space. An essential part of nature is adequate flow from the Stanislaus, Tuolumne, Merced and lower San Joaquin Rivers. About 60% of unimpaired flow between February and June would protect wildlife in the lower San Joaquin River and its three major tributaries.</p> <p>Whether one fishes, watches the birds who use the Bay-Delta area as a major stopover for the Pacific Flyway, or one who thrills at and perhaps eats the salmon, steelhead and sturgeon who migrate to and from their home streams to the Pacific Ocean—major good things begin to happen when enough water flows. You have the power to make that happen. I urge you to do so.</p>	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
594	1	I am opposed to your proposal to increase flows in our rivers. We need our water for crops. We need our water to help replenish our aquifer. We need to store our water to get through drought years.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
595	1	Please consider revising the flow of the winter-spring water on the San Joaquin to at least 50% or more. My family and I are willing to conserve water, especially so if all of the Joaquin water users will pitch in to help bring our state's second longest river back to life. We understand there are many competitors for this precious, life-sustaining resource. Nonetheless, fish need enough water to sustain.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
596	1	I am opposed to your proposal to increase flows in the Stanislaus River. It is not your water. We need our water for our farmers that grow the food that feeds this world and employs our people.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
597	1	I am writing because I am extremely concerned that the proposed Water Quality Control Plan allows more than half the water needed for the delta's ecological health to be diverted away for unsustainable agricultural practices in the San Joaquin Valley. Much like the recent commitment to alternative energies as we reach the end of the fossil fuel age, we must think about the future of our water sources for human use, agriculture, and for supporting wildlife.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
598	1	I live in Butte Creek Canyon and we have the last best run of spring Chinook salmon in the state. This only happens when government and public agencies work together to see the bigger picture and make plans that will support the environment and eco-systems in the long view.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
599	1	Thank you for understanding that the unimpaired flow standard must be increased. I urge you to set the standard to the minimum of 60% unimpaired flow that your own 2010 analysis has shown to be necessary to ensure the health of Delta fish species. Protecting the health of the Delta requires protecting the health of the fish.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
599	2	We must be doing everything we can to protect California's fragile fish habitats. Our ability to sustain wild life in California, and in fact perhaps our own lives, may well depend on it.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
599	3	Water conservation in the Central Valley and in the urban areas of Southern California is still not being employed at all to the degree that it could and should be. An honest scientific	Please see Master Response 1.1, General Comments, for responses to comments that either make a general

**Table 4-1. Responses to Comments**

Ltr#	Cmt#	Comment	Response
		approach to distributing California's water resources must require much more conservation, intelligent agricultural decisions and recognition of the preciousness of our fish.	comment on the plan amendments or do not raise significant environmental issues.