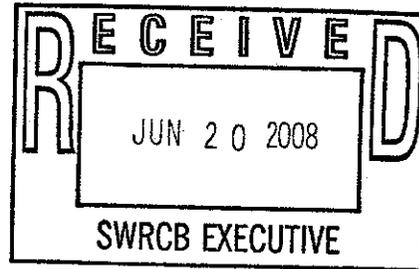


Valley Ag Water Coalition

910 K Street, Suite 300
Sacramento, California 95814

June 20, 2008

State Water Resources Control Board
Jeanine Townsend, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, California 95814



Dear Ms. Townsend:

I am writing on behalf of the Valley Ag Water Coalition to submit comments regarding the Proposed Strategic Plan Update: 2008-2012.

The Valley Ag Water Coalition represents approximately 43 mutual water companies and public agencies that together deliver a significant portion of farm water deliveries in the San Joaquin Valley from Stanislaus County to the Tulare Lake Basin.

The Coalition opposes Action 2.1.3 of Objective 2.1 of Priority 2 (Page 20 of the Draft Plan) as it may involve the initiation of an action in superior court to restrict pumping of groundwater. Coalition members believe it is appropriate to protect and restore groundwater quality by encouraging local entities to initiate the development of regional strategies to protect high-use groundwater basins (See Action 2.1.2). The Coalition believes such an approach will yield benefits much more quickly than seeking to impose limits on extractions by means of adjudication, which could involve over 20 years of legal, institutional and investigative studies before producing final judicial action.

Coalition members have joined with other entities to pursue integrated regional water management, Coalition members are participating in the Irrigated Lands Program and Coalition members have been working for decades to address drainage problems in the West Side of the San Joaquin Valley. Such efforts should continue to progress as they hold out the most promise for achieving improvements in groundwater quality where necessary.

The conjunctive use of groundwater and surface water has been, and will continue to be the keystone of maintaining agricultural production in the San Joaquin Valley. The State and the State Board have encouraged conjunctive use through statutory means and with the proceeds of General Obligation Bonds. Agricultural water districts must be assured going forward that the State Water Resources Control Board

June 20, 2008

Page 2

significant investments into conjunctive use will not be threatened by potential efforts to adjudicate groundwater basins with the intent to limit extractions. The reduced reliability of water exports through the Sacramento-San Joaquin Delta will only place increased importance on the conjunctive use of surface water and groundwater in the San Joaquin Valley.

The Coalition respectfully requests that the regional boards, in cooperation with local entities, be allowed the next four years to pursue the development of regional strategies to protect high-use groundwater conditions and withhold the inclusion of adjudication as an action at this time.

Thank you for your time and consideration.

Sincerely,

Robert J. Reeb
Executive Director

RJR: