



March 17, 2017

RE: 2016 Bay-Delta Plan Amendment & SED

Dear State Water Board,

This letter is submitted to express my **opposition** to increasing unimpaired flows on the San Joaquin River tributaries, especially the Tuolumne River.

I have been a resident of Modesto, CA since 1998 and believe this region has benefited from the thoughtful and careful stewardship by our local agencies of surface water (Tuolumne River) and ground water (Modesto subbasin). I believe the flow changes proposed by the draft revised Substitute Environmental Document (SED) will result in a very lopsided outcome:

- significant, negative impacts to area homes, businesses and agriculture
- insignificant, positive impacts to the environment.

The SED is a massive document, which I have not read and readily leave for the purview of experts. However, I did read the 8-page summary and watched the video from the Modesto public hearing available on your website, which prompted the following observations and thoughts:

- **More Flow.** Why is flow the only tool in the toolbox? What about non-flow options such as hatcheries and suppressing predation? If more flow = more fish, don't the numbers of all fish increase, including predators? Yet more salmon is the net result?
- **Adaptive Management.** Unimpaired flow is the metric for determining the amount of water, but the delivery of that water to the environment would be shaped and timed. Carryover storage is assumed (required?) to be available, which reduces (impairs) the availability of reservoir storage for non-environmental uses. Does the Tuolumne's natural flow regime have carryover?
- **Groundwater Availability.** Adequate groundwater is assumed to be available to offset the reduced delivery of surface water. However, surface water use contributes to maintaining and recharging groundwater. If surface water becomes less available, how can groundwater use simultaneously increase and be sustainable?
- **Environmental Use.** Ostensibly, increased flow is for environmental purposes. Does the plan guarantee that the additional flow from the San Joaquin will go into the delta and then go out to the ocean? Or is that water "fair game" for other use(s) once it gets to the delta?
- **Sequence of Action.** The plan sets up a process whereby expectations of flow levels are established in advance of and separately from what existing law and policy (ex: water rights, groundwater management) may ever allow. This appears to be putting the cart before the horse and hopefully won't become a very costly thought exercise.
- **The Best Solution.** The plan is described as a measured action which is needed to protect the delta. The summary states that failure to act now (accept this plan) could result in more draconian measures in the future. It appears we are being asked to make a deal with the devil we know versus the devil we don't know. Is this plan really the best solution available?

I appreciate this being a public process and having the opportunity to provide comments.

Respectfully submitted,

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Modesto, CA