



March 13, 2017

Public Comment
2016 Bay-Delta Plan Amendment & SED
Deadline: 3/17/17 12:00 noon

Felicia Marcus, Chair
Members of the Board
State Water Resources Control Board
PO Box 100
Sacramento CA 95812-0100



Re: Bay-Delta Water Quality Control Plan Update

Dear Chair Marcus and Members of the Board:

The Cities of Escalon, Lathrop, Manteca, Ripon and Tracy, along with South San Joaquin Irrigation District (SSJID), are united in voicing our strong opposition to the Water Quality Control Plan Phase 1 Substitute Environmental Document. This proposal, requiring 30-50 % of unimpaired flows from the Merced, Tuolumne and Stanislaus Rivers, signals a significant water supply threat to the nearly 200,000 residents, thousands of businesses and tens of thousands of acres of irrigated agricultural fields who rely on the Stanislaus River for our current and future water demands.

We oppose your plan for many valid reasons. Not only will it significantly harm agriculture, which is so vital to our economy—but it will also result in dramatic loss of supply for urban use, and drive local water users to rely on groundwater basins that are already identified by the Water Board as experiencing critical overdraft.

In 1995, the Cities collaborated with SSJID to develop the South County Water Supply Project to deliver reliable, Stanislaus River water supplies to our Cities (with Ripon expressing a desire to join at a later date when funding becomes available). The Cities pursued this program, understanding that quality and quantity concerns for groundwater sources could only increase over time and that future water demands would require a more diverse and secure water supply portfolio for the health and welfare of our residents. This program culminated in the design and construction of the Nick C. DeGroot Water Treatment Plant and 40 miles of delivery pipelines in 2005. Through SSJID's operation of the Water Treatment Plant and associated distribution facilities, our Cities receive quality drinking water that meets and exceeds the state's water quality standards. This facility, capable of treating and delivering approximately 42 million gallons per day, provides up to 70 percent of the water demand for our Cities annually and is a critical resource for meeting our current and future water supply needs.

This investment for our current and future needs came at a significant cost to our Cities and the ratepayers who paid for these facilities. The Cities collectively have invested over \$127,000,000 in the construction and operation of the water treatment plant and pipelines to deliver the treated water to four cities. The plant and delivery pipelines were also designed to accommodate future expansion in a manner that is economically feasible for our Cities to meet future projected growth.

Under the Water Supply Development and Operating Agreement between the Cities and SSJID, our regional urban and agricultural water supplies are treated equally. The agreement states:

"Any shortage or interruption in the supply of water available to the District shall be allocated by the District between agricultural users and the Project Participants such that any percentage reduction in the delivery of water to the City is approximately equal to the percentage reduction in the delivery of water to the District's agricultural customers."

The most recent drought period caused SSJID to trigger water supply reductions for the Cities and District agricultural customers by 20 percent and 16 percent in 2015 and 2016, respectively. With implementation of the SED as proposed, these reductions will occur regularly, and will cause the Cities to strand infrastructure investment in the water treatment plant by as much as \$63,000,000. The plan also seeks to extend and worsen drought conditions like the most recent drought period, significantly reducing the availability of critical water supply needs for health and human safety. These losses serve as a two pronged attack on our cities and our ratepayers, by both reducing the water supply, and by burdening our ratepayers with continued payment of encumbered debt for the surface water project without fully realizing future water quality and supply benefit of this significant investment.

Undoubtedly, you are aware that the SED will not only devastate our reliable surface water supplies, but will also have an immediate impact on the ground water supply in the region. To account for lost surface water, urban and agricultural users will be forced to increase ground water pumping, further over drafting the water table in a basin that is already critically over drafted. Furthermore, with the backdrop of the Sustainable Groundwater Management Act, this proposal will take away critical water supplies legally necessary to balance and protect against undesirable effects to our local groundwater basins for future generations.

We support a comprehensive approach to finding solutions for water reliability while maintaining healthy ecosystems, but not by sacrificing the local economy of our region for a plan that provides nominal fishery benefits. We feel that the multi-pronged approach that many of the regional irrigation and water districts have proposed to you--not strictly water flow, but a suite of functional flows, non-flow measures, and predation suppression--will result in a more workable long-term solution versus your proposal to commandeer surface water that has already been contractually committed to other uses. We implore the SWRCB to meet with the urban and agricultural surface water users who would face catastrophic losses from your proposal, and work out a compromise through settlement that balances regional fishery and urban/agricultural water supply needs.

Sincerely,


Jeff Laugero
Mayor, City of Escalon


Sonny Dhaliwal
Mayor, City of Lathrop


Steve DeBrum
Mayor, City of Manteca


Dean Uecker
Mayor, City of Ripon


Dale Kuil
President, SSJID


Robert Rickman
Mayor, City of Tracy