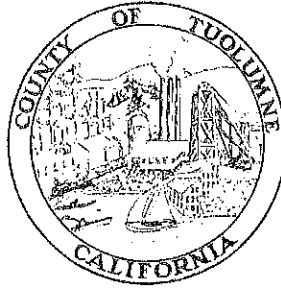


Tuolumne County
Administration Center
2 South Green Street
Sonora, California 95370



Alicia L. Jamar, *Chief Deputy
Clerk of the Board of Supervisors*

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BOARD OF SUPERVISORS COUNTY OF TUOLUMNE

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

March 7, 2017



Via Email

commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814-0100

Re: Comments on the proposed update to the 2006 Water Quality Control Plan for the San Francisco Bay-Delta and Estuary, Phase I process and the Substitute Environmental Document

Dear Ms. Townsend:

The Tuolumne County Board of Supervisors appreciates the opportunity to comment on the State Water Resource Control Board's (SWRCB) above referenced Substitute Environmental Document (SED) and the update to the Water Quality Control Plan (WQCP).

The County of Tuolumne has a total land area of approximately 1,456,000 acres and is home to the Tuolumne River and the Stanislaus River, the two largest tributaries to the San Joaquin River. Area of Origin filings were made on the Stanislaus River by the State of California with a priority of 1927. It must be emphasized that the water for the unimpaired flows the SED is proposing will largely come from Tuolumne County, which if approved, could create significant and unmitigated physical and socio-economic impacts to this County. Although the County of Tuolumne is not a water supplier, the Board of Supervisors shares the long-term objective with our water suppliers, of developing and maintaining safe, affordable and reliable access to water for our residents our communities and our own upstream-ecosystem. Delta water

quality is not the only environmental consideration to be considered. For example, the Middle Fork of the Stanislaus River upstream of New Melones reservoir is a California designated Wild Trout Stream and management of flows for that resource are superior, in our opinion, to the delta. The Board would like to express our great concern over the inadequate analysis in the SED of these many factors as well as the shadow cast on our water supplies as created by the SED.

It should be noted that the County of Tuolumne is a member of the Joint Powers Authority that governs our Tuolumne-Stanislaus Integrated Water Resources Program. That program, initiated at the local level out of choice, has been successfully dealing with complex, multi-faceted natural resource issues for over a decade. The IRWM plan area includes virtually all of Tuolumne County and portions of Calaveras County. The IRWM is locally funded and provides a forum for resolving assistance to disadvantaged communities (most of Tuolumne County has been classified by the Department of Water Resources as a disadvantaged community), non-governmental organizations as well as our own local governments and agencies. The United States Forest Service - which manages the majority of the watersheds in the Sierra Nevada Mountains is also a participating agency in this venue.

Two of the largest water suppliers in Tuolumne County are the Groveland Community Services District (GCSD), whose surface water supply comes from the Tuolumne River and Tuolumne Utilities District, whose surface supply comes from the South Fork of the Stanislaus River. The GCSD's water supply comes via Hetch Hetchy Reservoir's mountain tunnel through a contract with the San Francisco Public Utilities Commission's Hetch Hetchy system. GCSD is an Urban Water Supplier and may contractually provide treated water to up to approximately 22,000 customers in the communities of Groveland, Big Oak Flat and Pine Mountain Lake. GCSD has a contract allotment of 4,900 acre-feet of water per year and their service area covers approximately 25 square miles in southern Tuolumne County. It bears mention that the GCSD's communities and service area encompass much of the "northern gateway" along Highway 120, to Yosemite National Park.

Additionally, the Tuolumne Utilities District (TUD) water supply from the Stanislaus River comes from a contract with Pacific Gas and Electric Co (PG&E). TUD's surface supplies are sourced from Pinecrest Reservoir and Lyons Dam and delivered via the PG&E main canal system to TUD. TUD provides wholesale and retail service to other water agencies as well as individual customers. TUD is also an Urban Water Supplier that supplies the Twain Harte Community Services District, the City of Sonora, and the towns of Jamestown, Columbia and numerous others. It also supplies the local hospital, the Columbia CAL FIRE Air Attack Base, City and County Government Centers, the County's high schools, a number of elementary schools, the local

community college, Columbia Historic State Park, Railtown 1897 State Historic Park, most long-term care facilities in the County, as well as the County's probation facility and jail. In all, TUD supplies approximately 40,000 people as well as a significant year-round tourism population. TUD's current annual water use is approximately 17,000 acre-feet and its system is the anticipated source of future supplies for much of the planned areas of development under the County's General Plan.

The SED proposes potential decreases in available surface water to Tuolumne County residents and your staff recommends these reductions in surface water be supplemented through groundwater supplies. Tuolumne County has no groundwater basin and all groundwater supplies are fractured rock sources with unreliable quality, quantity and sustained yield. Moreover, there is no geologic or hydrologic methodology to predict groundwater locations, depth, water quality or safe yield. Tuolumne County has seen approximately 267 wells serving 349 homes go dry in the past two years due to the consequences of sustained drought and that number continues to increase. Wells are costly to drill in the foothills and not always feasible. Wells that do go dry from over pumping may not ever recharge. In short, the only reliable water supply in the County is surface water and as noted above, that source is what the majority of its residents, businesses, communities and recreationists use.

In addition, the analysis detailed in the SED fails to adequately address the economic impacts to upstream Counties such as Tuolumne County. The County's economy relies heavily on tourism for water-related recreation in the reservoirs of New Melones, Don Pedro and Pinecrest as well as the Wild and Scenic Tuolumne River and the trout fisheries in our streams. Unimpaired flows of 40% as well as some of the proposed non-flow measures in the SED could not only cripple Tuolumne County's recreation and tourism industries but could stifle the County's growth and development by devastating important industries in our area such as logging and agriculture which both rely on surface water supplies for their operations.

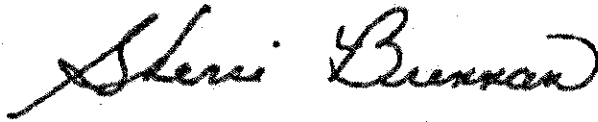
The Board of Supervisors requests the SWRCB incorporate Tuolumne County's critical municipal and agricultural supplies as well as the potential economic impacts into the analysis incorporated in the SED. We are concerned that absent such analysis and consideration in the Phase I process, critical upstream supplies may be diminished. Additionally, the failure of the SWRCB to consider potential impacts to upstream water supply now and in the future could jeopardize the economic base of Tuolumne County and threaten the quality of life for the residents of our County as well as the tens of thousands that visit our County as tourists each year. The overly simplistic solutions and inadequate analysis in the SED is not sufficient for the complex nature of natural resources issues and the Tuolumne County water needs as noted in this letter.

Tuolumne County has reviewed Governor Brown's letter to Chair Marcus regarding the development of a comprehensive agreement for environmental flows so that we may start improving water quality in the Delta and its tributaries. We are

Jeanine Townsend, Clerk to the Board
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supportive of the Governor's objective in the development of voluntary, comprehensive agreements and wish to go on record as requesting that the Tuolumne County Board of Supervisors be included in any such discussions regarding the Tuolumne River, the Stanislaus River and their tributaries. Thank you for the opportunity to provide these comments.

Sincerely,



Sherri Brennan,
Chair, Board of Supervisors

I hereby certify that according to the provisions of Government Code Section 25103, delivery of this document has been made.

By: 
ALICIA L. HMAR
Clerk to the Board