

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

Ltr#	Cmt#	Comment	Response
2400	1	Stop this craziness. Save California agriculture, please!	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.
2401	1	Quit being unfair with water distribution to the Central Valley farmers.	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.
2402	1	Stop taking our water! I have a new well, but who knows how long that it will be viable? I'm surrounded by orchards that are all new since I moved into my home 3 years ago.	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.
2403	1	We as a state need to build more water storage to help aid in times of real drought. And the regulations on mandatory water release need to change!	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.
2404	1	Central California is the bread basket of the world. Take away our water and you destroy California. Change salt water to drinking 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.
2405	1	Leave our water alone! It is not right that we care more about conservation of our water than those that you want to give it to. Have down south dig wells for their water and stop wasting 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.
2406	1	By nature alone, we struggle with water enough as it is. Living in the Central Valley of California has become miserable. Our lawns are gone, our children's' parties have difficulty obtaining permission to use waterslides, and we are tired of it. Our California used to be beautiful and can be once again. Our Californians used to be happy and can be once again. We should be working together to fix our existing problems instead of using them as excuses to make matters even worse than they already are.	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.
2407	1	Farmers need water! Our food supply must come 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.
2408	1	The farmers who supply much-needed food to many areas. Without the water needed, you are creating a very future nightmare.	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.
2409	1	We are the food basket of the world. We need water for the growth of our vegetables and trees. We do not need to worry about the Delta Smelt or trains give us 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.
2411	1	The water board makes me sick with these decisions! JFK would be rolling in his grave if he saw how low the San Luis Reservoir is. The dam and reservoir were built to conserve water, not let it out to the ocean for some insignificant fish. Environmentalists have way too much power.	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.
2412	1	People need to be a priority over fish. Farmers provide food and jobs for the economy. Don't take more water from the farmers and the 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.
2413	1	Stop the madness. The country needs our produce and we need to keep our folks employed.	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.
2414	1	No I will not let you destroy our farms or cause our wells to go dry.	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.
2415	1	Collaboration between state and local governments is key. Get everyone in the same room.	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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		Leave ego outside. California is going to lose all its farmers and wonderful variety of food.	comment on the plan amendments or do not raise significant environmental issues.
2416	1	Think real hard about the fish that are not native to this area and know how this will greatly devastate California.	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.
2417	1	This is ridiculous. Why isn't there any data or evidence in regards to other factors affecting the salmon? There are plenty of other solutions besides releasing more 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.
2418	1	Enough is enough. This board has taken water at will and has overstepped its authority without regard to human beings. Operate the system the way it was designed and leave the operations to the experts.	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.
2419	1	Drought kills people and jobs and industry and economy.	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.
2420	1	Merced County needs a sustainable 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.
2421	1	I am a young farmer that operates within the Modesto Irrigation District. Increasing the river flows will severely affect my business and the future of it. The area within the MID and TID are very unique in regards to climate, soil, and water quality.	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.
2422	1	We have to conserve our water before we can send more to SoCal.	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.
2423	1	Grew up in the valley (Firebaugh) and moved. Regardless, every time we take that drive up north to the Central Valley we cannot help but notice all the billboards and signs bringing awareness of the water crisis and drought in our valley. My father was lucky to retire but was a committed farmer in those fields in the valley that are feeling the drought. I hope more is done to help those farmers.	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.
2424	1	Prime Ag land remains a priority--Williamson Act--stop diverting valley waters!	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.
2425	1	Is the Water Board dependent on the legislature or can they govern where and the amount of water goes where?	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.
2426	1	Our farms and dairies won't survive another round of this self-inflicted drought. You are ripping out the heart of Central California. This is an agricultural state. Without water, crops and livestock will continue to die. Generations of farmers and dairymen are being wiped out because the cost is too high. I am not a farmer or dairyman but I can still see and hear those all around me. I was born and raised here. I see the orchards and fields plowed under. Dairies not able to afford the higher prices in feed, selling off their cows. Look longer and closer at what the water shortages have already 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.
2427	1	We need to keep our water here. Our jobs and our future depend on 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.
2428	1	We are ranchers and have irrigated pasture. We need this 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.

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2429	1	This is outrageous. Water is necessary for life. They have no right to take 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.
2430	1	Los Angeles and the surrounding area should be living like they are in the desert with minimal water usage and minimal landscape. Much like Las Vegas or Arizona. If they don't like the desert then they can move, no turn us in the northern valley into a desert.	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.
2431	1	If the educated idiots in office would stop wasting the water we have by sending it to the ocean, we wouldn't have the drought they claim we have. How about thinking of people instead of fish. Instead of sending so much water south, they should force the people there to put in numerous desalination plants up and down the coast to support their water usage.	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.
2432	1	Stop this nonsense. Don't do this to us, what you wouldn't want the Federal government to do to you. Because if the government were to regulate the State's water supply, I'll be damned if y'all wouldn't have a cow.	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.
2433	1	I was an adult when our state government tried to install the peripheral canal and was against it then and am now for the same reasons--the destruction of the Delta environment, loss of jobs and farms, saltwater intrusion into the Delta and groundwater, and on and on. I see no benefit for the citizens of northern California in this preposterous idea.	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.
2434	1	Those of us who live in the valley have a right to be in on the decision making about our water and how it is used, stored, regulated, and diverted.	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.
2435	1	We need to keep water here in our valley to be able to produce food for the state.	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.
2436	1	Stop wasting our water and why are we not putting in extra 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.
2437	1	Tell the Water Board that I do not like their plan to divert water away from our valley. Do not redirect the water resources that are so desperately needed by our farmers.	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.
2438	1	The State's proposed increase in water flows down the Merced, Stanislaus, and Tuolumne Rivers will destroy agriculture in the Central Valley with no material effect on the salmon population in those rivers. In this case, human economic vitality is more important than an attempt to save the salmon population.	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.
2439	1	Valley farmers need this resource more than southern California neighborhoods. Put them under greater restrictions.	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.
2440	1	Stop diverting our water & build more storage lakes.	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.
2441	1	I sometimes think these people that come up with these ideas forget that California is an agriculture state and the valley is the food belt of the county/world.	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.
2442	1	Stop wasting our hard-earned money. Stop stupid projects, like the so-called bullet train.	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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2443	1	Water is the lifeblood of the Central Valley. Taking our water would be devastating to our jobs, businesses, and families.	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.
2444	1	We need to have a voice in formulating rules and laws that regulate water. It's just plain wrong not to include us in a decision that impacts so greatly on our lives.	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.
2445	1	Stop the unrestricted flow requirements on the Stanislaus, Tuolumne, and Merced Rivers. We deserve the water we have first rights to.	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.
2446	1	Don't turn Stanislaus and Merced Counties into a dust bowl.	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.
2447	1	We need our water here for us and our farmers.	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.
2448	1	Our well water level has already dropped 100 feet. We are dry...	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.
2449	1	We are already not allowed to water our lawns and our water pressure is horrible. Keep our valley water. We can't afford to lose jobs.	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.
2450	1	I oppose giving up 40% of my water rights.	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.
2451	1	As a supporter of American Rivers, Tuolumne River Trust, Merced River Conservation Committee and Golden West Women's Fly Fishers, I am writing today to urge you to increase flows and fishery protections in the San Joaquin River and its tributaries, including the Stanislaus, Tuolumne and Merced rivers. As part of your obligations under state and federal law, we urge you to develop a Water Quality Control Plan that will protect water quality, restore floodplain habitat, double salmon populations and create a more sustainable water future for local farms and 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.
2451	2	In particular, the Board should:  Order dam owners to release significantly more water to the river and its tributaries, particularly during the spring when vulnerable young salmon and steelhead migrate to the ocean.	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.
2451	3	In particular, the Board should:  Require federal, state, and local agencies to work together to restore floodplain and wetland habitats along the river for fish and 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.
2451	4	In particular, the Board should:  Enforce state and federal laws to protect water quality and double salmon populations.	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.
2451	5	The San Joaquin is Central California's largest river, supporting endangered fish and wildlife, cities and towns and one of the most productive agricultural regions in the world. However, the river is so overtapped that it has run completely dry in stretches during recent years. Due to low flows, many reaches are too warm to support salmon and steelhead trout.	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>Outdated levees have destroyed critical floodplain wetlands and exacerbated flood risk. Poor water management in the basin has led American Rivers to list the San Joaquin among America’s Most Endangered Rivers® of 2016.</p>	
2451	6	<p>The Board must act soon to increase flows and restore habitat in the San Joaquin and its tributaries so that the watershed is healthy enough to support fish and wildlife, sustainable agriculture, and resilient communities for generations to come. This year’s drought will not be California’s last, and a healthier San Joaquin will enable the river and its many stakeholders to better weather the next one.</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>
2451	7	<p>Your leadership is essential to ensure that critical measures are included in the Water Quality Control Plan that can help put the San Joaquin, Stanislaus, Tuolumne, and Merced Rivers on the path to recovery. I urge you to join the citizens, businesses, ranchers, boaters, anglers, outfitters and thousands of others calling for the restoration of the San Joaquin and its tributaries to support robust salmon runs, sustainable agriculture and healthy communities.</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>
2452	1	<p>We don’t need a manmade desert. Retain the San Joaquin just like we need to do for all our rivers.</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>
2453	1	<p>We [Sustainable Conservation] stress the need for the SED to recognize and address the potential impacts of the new flow requirements on the efforts of the region’s Groundwater Sustainability Agencies (GSAs) to comply with the requirements of the Sustainable Groundwater Management Act (SGMA). The Water Board, the Department of Water Resources (DWR), and the GSAs must work together to develop a coordinated strategy including wet year diversions for groundwater recharge, non-flow alternatives for fishery improvement, and water conservation and efficiency measures in order to avoid long-term damage to the people of the San Joaquin Valley--particularly the agricultural and disadvantaged communities that are dependent upon water for their livelihoods, income, health, and well-being.</p>	<p>Please see Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act for discussion of the approach to the groundwater impact analysis, groundwater recharge, SED consideration of SGMA, and groundwater dependent ecosystems.</p> <p>SGMA was passed by the legislature in 2014 to address overdraft issues and associated negative impacts to groundwater basins from over extraction. GSAs are now formed in the plan area, but GSPs have yet to be drafted or implemented. The State Water Board acknowledges reaching sustainability in these overdrafted basins will be challenging, but the plan amendments do not conflict with SGMA. Instead, knowledge of the plan amendments during the GSP drafting phase allows for integrated planning of scarce water resources that does not trade impacts between surface and groundwater.</p> <p>SGMA was not included in the baseline or alternatives analysis, because as noted above, GSPs are not yet written and groundwater sustainability could be implemented through projects and programs in a number of ways, and any future-condition baseline “with SGMA” would be speculative. However, SGMA was properly included in the analyses as an existing legal requirement to prevent further degradation of the groundwater basins and as a potential cumulative limit on future irrigation supplies (Chapter 9, Section 9.4.3, Impacts and Mitigation Measures; Chapter 22, Section 22.4.1, Potential Impacts of LSJR Alternatives).</p> <p>The SED does not require or encourage increased groundwater pumping. The SED analyses reflect that the historical local response to reduced surface water availability has been to choose to increase groundwater pumping; therefore, the SED was required to analyze this reasonably foreseeable action and its impacts on the groundwater basin from this local response.</p> <p>The level of detail in the groundwater impact analysis is reasonable and appropriate for a program-level analysis and is not meant to be, nor required to be, a site-specific analysis. Estimating variables like sustainable yield, declines in groundwater levels, and groundwater-surface water interactions is beyond the scope of the SED, because those variables require site-specific information and groundwater modeling. Moreover, it is speculative to assume how pumpers in each area will respond to implementation of the flow objectives, because it will depend on many individual and collective decisions including, but not limited to, the discrete actions of local water users in response to reductions in surface water, crop choices in response</p>

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			<p>to markets and other factors, conservation measures, and implementation of SGMA.</p> <p>Providing technical assistance to local agencies to comply with SGMA is also beyond the scope of the SED. However, SGMA requires the Department of Water Resources provide guidance and technical assistance to local agencies (Wat. Code § 10729; see <a href="http://www.water.ca.gov/groundwater/sgm/">http://www.water.ca.gov/groundwater/sgm/</a>).</p> <p>Please see Master Response 2.7, Disadvantaged Communities, regarding the financial and technical assistance programs available to assist disadvantaged communities.</p>
2453	2	<p>Flows and Restoration</p> <p>Enhanced Flows with Flow Management Flexibility in Wet Periods: Sustainable Conservation supports higher instream flows in combination with high quality restoration projects that will help improve fish survival and ecosystem health. Improved flows in all years will provide a range of crucial habitat, hydrogeomorphic and Delta salinity level benefits. In wet years, however, we believe that high stream flows are sufficient to allow greater flexibility for groundwater recharge--both within and beyond the floodplain.</p> <p>During times of high runoff, we propose the Water Board determine an optimal channel-forming flow (in cfs). Flows in excess of that should be available for diversion for groundwater recharge and off-channel floodplain inundation as would have occurred naturally prior to construction of levees. Substituting this minimum channel-forming flow requirement for the proposed percentage of unimpaired flow would provide this wet-year flexibility and help integrate the goals of SGMA with those of the Plan.</p>	<p>Please refer to Master Response 1.1, General Comments for information regarding the State Water Board support for voluntary agreements so long as they meets the Board’s statutory and constitutional obligations as well as take in consideration the balancing of beneficial uses for fish and humans. In that context, and in conjunction with the proposed flow and salinity objectives, non-flow measures including restoration opportunities to maximize floodplain benefits, would be beneficial. As stated in Master Response 3.1 Fish Protection, with higher, more frequent overbank flows associated with the LSJR alternatives, potential growth and survival benefits are expected to extend throughout the rearing and migration corridor for juvenile salmon, including tributary reaches where the active floodplain is narrow and such habitat is limited to narrow strips of riparian vegetation along the channel margins. Where low-lying floodplain and off-channel areas occur naturally and where floodplain restoration has been implemented, those benefits would be further enhanced. In this respect, where more flood plains are established, more available groundwater recharge could potentially occur. Please see Master Response 2.2, Adaptive Implementation, for additional information regarding methods and examples of adaptive implementation and opportunities to support multiple beneficial uses. Regarding groundwater recharge, through the Sustainable Groundwater Management Act (SGMA), local actions could be taken by Groundwater Sustainability Agencies (GSAs) through their Groundwater Sustainability Plans (GSPs) to enhance groundwater recharge on a sub-basin level through habitat restoration. By linking long-term habitat restoration with long-term groundwater sustainability programs, there would be more local jurisdiction oversight, compliance, and potential funding.</p>
2453	3	<p>Habitat Restoration: As the SED states, aquatic and riparian habitat for fish and wildlife in the Delta and the San Joaquin River system has been impaired to such an extent that increased flows alone, no matter what the percentage increase may be, will not be enough to achieve the state’s ecosystem and fish population recovery goals. We strongly believe that a combination of increased flows in the San Joaquin system accompanied by badly needed habitat improvements is essential in order to achieve fish and wildlife recovery. In particular, a concerted strategy to set levees back from the river edge, and remove them where feasible, through multiple-benefit restoration projects in the San Joaquin River and its tributaries, should be a focus of the SED’s recommended non-flow restoration actions.</p> <p>We also believe that these habitat improvements, if put in place, can substitute for a percentage of diversion reductions that would otherwise be imposed under the Plan, when there is a reasonable assurance that the ecological value is equal to/has been attained through the non-flow action. We recognize that an accurate method for determining the equivalency of restoration and increased flows must be developed.</p> <p>We understand that the Water Board believes that its authority only extends to flows themselves, and not to requiring habitat restoration. We urge the Water Board not to be overly cautious or conservative on this matter. Restoration must play a central role in the strategy presented by the SED.</p>	<p>The State Water Board recommends, but does not require, that non-flow measures be included as part of a comprehensive effort to address Delta aquatic ecosystem needs, as set forth in Appendix K, Revised Water Quality Control Plan. The State Water Board recognizes the importance of implementing non-flow measures for protecting fish and wildlife.</p> <p>The State Water Board agrees that an integrated, comprehensive approach to protect the Delta ecosystem is needed. The State Water Board also recognizes the importance of implementing non-flow measures for protecting fish and wildlife. Therefore, non-flow measures are included in the program of implementation as recommendations and, if parties choose to implement them, non-flow measures may inform adaptive implementation of the flow water quality objectives. As stated in Appendix K, Revised Water Quality Control Plan, the recommended non-flow measures are complementary to the LSJR flow objectives for the protection of fish and wildlife. Please see Master Response 5.2, Incorporation of Non-Flow Measures, for further discussion on the State Water Board’s authority related to flow actions, and consideration of non-flow measures in the plan amendments.</p> <p>Please see Master Response 3.1, Fish Protection, for a discussion regarding the scientific justification for flow in protecting fish and wildlife, and a detailed clarification of predation as the non-contributing factor to salmon population decline.</p>
2453	4	<p>Voluntary Settlements: We have been strongly supportive of the Water Board’s advocacy of voluntary settlements to help achieve the state’s goals. Sustainable Conservation has a long</p>	<p>Please see Master Response 1.1, General Comments, and Master Response 2.1, Amendments to the Water Quality Control Plan, for responses to comments by the State Water Board supporting voluntary</p>

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		<p>history of working to promote habitat restoration on private and public lands. Whatever the outcome of the voluntary settlement negotiations, we recommend, based on our experience, that the Water Board implement the following specific actions in order to encourage development of cooperative agreements that include several types of high priority non-flow actions:</p> <ol style="list-style-type: none"> <li>1. Create a roadmap to help potential project proponents understand how to select/prioritize projects, acquire partners, and to plan, develop, and implement restoration projects.</li> <li>2. Identify potential funding sources and collaborators for projects.</li> <li>3. Additional programmatic or "simplified" permits should be developed now to cover a variety of restoration actions. This would significantly reduce permitting costs, save time, and get more on-the-ground restoration done sooner. The Water Board could build off its existing restoration permit and adapt it for larger projects. We also encourage you to work with the Resources Agency so programmatic authorizations are developed by other agencies, in order to see the work through the entire environmental review process in an efficient and cost-effective manner.</li> </ol> <p>Without the guidance provided by these measures, local water agencies and landowners may find that pursuing voluntary non-flow measures appears to be too complicated or expensive. Providing clear guidance and real incentives will increase the likelihood of obtaining agreements, getting projects implemented, and achieving success for the overall program.</p>	<p>agreements, including a clarifying discussion of some of the components of voluntary agreements, and a discussion of flow and non-flow measures. Non-flow measures are also discussed in Chapter 3, Alternatives Description, and evaluated in Chapter 16, Evaluation of Other Indirect and Additional Actions.</p>
2453	5	<p>Groundwater</p> <p>The SED and SGMA: We believe strongly that the SED must fully consider and address its potential impact on the implementation of the Sustainable Groundwater Management Act (SGMA). Otherwise, implementation of the new surface flow requirements may inadvertently complicate the work of the Groundwater Sustainability Agencies (GSAs) and increase the negative impacts of SGMA implementation on San Joaquin Valley agriculture and communities, including disadvantaged communities that rely almost exclusively on groundwater.</p> <p>The SED proposes to make up a substantial part of the deficit in water supply for agriculture and municipal uses created by increased instream flows with increased groundwater pumping. This shift will make the affected surface water users more groundwater dependent and, as the SED states, most likely result in "undesirable results such as significant and unreasonable reduction of groundwater storage and degradation of water quality" over and above the pre-existing condition of the basin. The current SED language suggests that these new impacts will need to be addressed by the GSAs once they begin the work of SGMA implementation.</p> <p>Since replenishing the groundwater supply will be challenging under the proposed flow regime (without a major commitment to diversions for recharge in wet years), the GSAs will most likely need to rely primarily on demand reduction--restricting pumping along with promoting water-use efficiency and other voluntary conservation measures. While improved water use efficiency can result in improved crop quality and yield, pumping restrictions can cause economic hardship to farms and communities, especially those that</p>	<p>Please see response to Comment 2453-1.</p>

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		become more dependent on groundwater as a result of the proposed new flow regime.	
2453	6	<p>We understand that the Water Board does not intend to make the implementation of SGMA more complicated or burdensome for the regions affected by the proposed new flow regime. Therefore we recommend that the Water Board not leave addressing the impacts of its instream flow policies to the GSAs implementing SGMA, but instead recognize and address these potential impacts in the SED and work collaboratively with the Department of Water Resources, and the appropriate GSAs as they are formed and begin their work, to develop an integrated strategy that achieves the goals of both the Bay-Delta Plan and SGMA.</p> <p>We also believe the Plan should discuss options for financial and technical assistance for the agricultural community and residential and municipal water users who face hardships resulting from the implementation of the Bay-Delta Plan and SGMA. Finally, we recommend that the Water Board include specific financial and technical assistance options to reduce potential impacts to disadvantaged communities. The recently enacted federal Water Resources Development Act and California's Proposition 1 should be considered as possible sources of funds for the pursuit of identified options.</p>	Please see response to Comment 2453-1.
2453	7	<p>Groundwater Substitution: The SED does not address the environmental/hydrological impacts of groundwater substitution on groundwater-surface water connection and shallow groundwater dependent ecosystems. Groundwater substitution can negatively affect baseline flow in connected river systems and require greater unimpaired flows in dry and normal years to maintain aquatic conditions. Groundwater substitution can also reduce the establishment and effectiveness of off-channel, non-flow restoration projects that rely on shallow groundwater for vegetation success. We recommend that the diversion of high-flow year surface water be maximized for groundwater replenishment and off-channel flood plain/wetland habitat maintenance, and that the SED be amended to address impacts on connectivity and shallow systems.</p>	Please see response to Comment 2453-1.
2453	8	<p>The SED and the Central Valley Flood Management Plan: In addition to SGMA, the SED should be better integrated with the Central Valley Flood Management Plan, particularly the Flood Plan's recommendations for managing current and future high flow events in wet years (which may be exacerbated by climate change). Wet year diversions onto reconnected and restored floodplains, for instance, would be especially effective in achieving groundwater recharge, flood flow attenuation, and juvenile fisheries habitat improvement.</p>	Potential impacts related to flooding are addressed in Chapter 6, Flooding, Sediment and Erosion. Please see Master Response 5.2, Incorporation of Non-Flow Measures regarding implementation of non-flow measures, including those related to flooding and floodplains. See Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act for information regarding SGMA.
2453	9	<p>The SED could have a profound positive impact on fish populations and habitat in the San Joaquin River and Delta ecosystems; it could also greatly impact the people and communities in the affected region, and the implementation of SGMA and the Central Valley Flood Management Plan. It is essential that the Water Board make every effort to take an integrated approach to achieving its goals and aligning them with those of SGMA and the Central Valley Flood Management Plan.</p>	Please see Master Response 1.1, General Comments, for responses to comments regarding the Sustainable Groundwater management Act. Master Response 1.1 also provides a broad discussion of how the plan amendments would be integrated with other efforts.
2453	10	<p>The integrated, outcome-driven approach that the Water Board needs to adopt should include not only increased flows, but clear, strong support for implementation of non-flow restoration actions, water conservation, agricultural water use efficiency, and use of available peak flows for groundwater recharge at a meaningful scale.</p>	Please see response to comment 2453-3.
2454	1	I oppose the State Water Board's plan to divert water from our rivers. Instead, build more	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
		dams for water storage and recreation.	comment on the plan amendments or do not raise significant environmental issues.
2455	1	Stop this ridiculous plan. The State Water Board is against farming!	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.
2456	1	We stopped growing gardens and let our grass die and now we have water to give away? When did the drought end?	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.
2457	1	Think about the people and the agriculture. It's critical to have water so we can feed our nation. Think about much food the Central Valley produces for our nation?	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.
2458	1	"Let us never forget that the cultivation of the earth is the most important labor of man, when tillage begins other arts follow--the farmer therefore is the founder of civilization." -- Daniel Webster	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.
2459	1	Without the water there will be no food, jobs, or future to be had in California.	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.
2460	1	LA needs to build a dam and save their own 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.
2461	1	Do not divert our water, we need it to produce the fruit the rest of the U.S. needs.	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.
2462	1	How long do you think you can continue to convince Californians that our water shortage is caused primarily by nature rather than your regulatory bungling? Let our voices be heard before unleashing more burdens on our residents, our businesses, and our economy.	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.
2463	1	Stop taking our water for your profit!	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.
2464	1	Please stop this insanity! We need balance, not anti-food production.	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.
2465	1	I have seen the dry lake beds, empty fields, and towns with no running water. If it gets any worse I will have to move my family out of the 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.
2466	1	We need our own water, not ship it south.	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.
2467	1	Agriculture in the valley is our most important industry. Save the water for our children.	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.
2468	1	Stop taking our precious resources such as water and giving it down to southern CA.	Please see Master Response 1.1, General Comments, for responses to comments regarding state and federal water project diversions.
2469	1	I didn't even plant my crop this year because I wouldn't have had enough water to irrigate it through to harvest. I've lived here in the Central Valley all my life and I've never seen so many fields left empty.	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.
2470	1	Stop wasting our water on smelt and let's feed our country.	Please see Master Response 1.1, General Comments for responses to comments that either make a general

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Ltr#	Cmt#	Comment	Response
			comment on the plan amendments or do not raise significant environmental issues.
2471	1	Stop playing politics with our water! It seems that the average citizen has no voice in what happens to our most precious of resources!	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.
2472	1	Stop this! The drought and other circumstances is responsible for my family's ill health-- "what goes down will come up"! And it is not good! Living on an old almond orchard in the middle of a fast-growing town, our only source of water is well water, groundwater, within 3 miles of the ammunition plant--a super fund site for toxics and leaking plumage--we get no help. We hang on a shoestring of life, see our facebook page "Curtis glory" (Baca Investigations) pictures, videos, we have proof that our water dried up making us ill along with many more roots still yet to be discovered we suffer. Water is life, it must be pure!	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.
2473	1	Please help the disadvantaged communities in our area by keeping the water here.	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.
2473	2	Ag is the lifeblood of Merced County.	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.
2473	3	We as a community have been asked to follow SGMA which will bring the Merced water basin into balance.	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.
2473	4	This water grab will take the surface water needed to help bring the Merced water basin in balance!	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.
2473	5	Without water many jobs will 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.
2474	1	This water grab will really hurt Merced County.	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.
2475	1	No water=no jobs=no food.	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.
2476	1	We need aboveground storage for people, ag, and fish. More storage=more 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.
2477	1	Are you people crazy, California farmers can't give up their water. California needed food.	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.
2477	2	Desalination plants for their water and recycle. Look what they did to Owens Valley and Colorado rivers.	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.
2478	1	Build more dams to collect water which can then be used to flow down the rivers. Prior to any dams being built in CA there was very little management of the water for the salmon and they survived during droughts without water flowing down the rivers. Our government should not be allowed to play God and try to control our 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.
2479	1	Do not divert our water. Leave our water alone. Food grows where water 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.

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Ltr#	Cmt#	Comment	Response
2480	1	Stop taking water from the cities and counties without doing an in-depth study and thorough input from all the stakeholders.	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.
2481	1	Stop taking our water without any disregard to the citizens of the varies cities, surrounding counties, and the farmlands without our permission. Water is more then just the livelihood or survival of the fish but of all God's creatures which includes us (humans).	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.
2482	1	Please stop decimating our rivers, fisheries, crops, and livelihoods.	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.
2483	1	California and the Federal government have: 1) virtually ceased water deliveries to the SWP and CVP for farming; 2) initiated the SGMA; 3) refused to use water bond dollars to construct storage; and 4) now taking river water for export to the ocean and failed fish recovery efforts. Our family farming operation and dozens of employees and their families will not survive your policies.	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.
2484	1	There needs to be more time and more studies done. The current releases on the Stanislaus haven't resulted in more trout and 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.
2485	1	How can an appointed governing body have so much power?	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.
2486	1	Stop giving [away] our water. Set up desalination plants if you want water you idiots!	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.
2487	1	I am a farmer and food processor in the San Joaquin Valley that employs over 500 people. Our businesses and employees' jobs are at risk due to the senseless policies which allow tremendous volumes of water to flow out to the bay. This needs to change soon to avoid the permanent loss of thousands of jobs.	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.
2488	1	Stop the over-regulation. It's not based on good 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.
2489	1	We live along the Merced River. We farm 443 acres of alfalfa, oats, corn, and almonds. We need water for our crops! The last years have been so stressful!	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.
2490	1	Having worked 48 years in local government, including managing Merced County, two cities, and three water districts, this plan smells like dead fish. Surely there is a more reasoned way to bring parties together.	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.
2491	1	We need this water to grow our food. Central California produces so much food for the rest of the nation, so why take it away from us? It does not make 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.
2492	1	The Valley has been very helpful to the rest of the state. It's too much to ask us to sacrifice our own drinking water and what is needed for our primary industry--agriculture--which feeds the rest of the nation as well. No one will provide the water we need here in the Central Valley. We must keep our own and only share whatever is surplus. We pay taxes, work, and live--just like anyone in the rest of the state. We deserve the right to survive both physically and economically.	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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Ltr#	Cmt#	Comment	Response
2493	1	In support of saving our water for farming, not strictly environmental purposes. There has to be a balance.	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.
2494	1	Contrary to popular Orange County and Bay Area belief, the food consumers eat does not simply come about on the shelf of a local grocery store. 8% of the entire nation's agricultural production (food, that is) comes from the Central Valley's farming. Agriculture in the Central Valley is not only a thriving industry, but a necessity. So let's put the focus on food. 75% of irrigated land in California is located in the Central Valley. In our current drought, we need to allocate water to the Central Valley; without sufficient water resources, dying crops is synonymous to a dying food	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.
2495	1	California is the number one agricultural state in America. Without water for our farmers more wells will dry up, less food can be grown, and food prices will rise. Without food in our bodies we cannot invent, create, or be industrious! Water is essential to life as is the food it grows.	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.
2496	1	Keep the water in the valley. Farmers and crops are more important than pools and golf courses.	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.
2497	1	We cannot afford to take any more water from the rivers until the we have ample rains again.	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.
2498	1	CLEAN DRINKING WATER and keep us from getting sick with these different diseases	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.
2499	1	Fill the Dams	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.