

July 27, 2018

VIA ELECTRONIC MAIL

LSJR-SD-Comments@waterboards.ca.gov

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95814-0100

Re: Comments of Tehama-Colusa Canal Authority on Proposed Amendments to the Water Quality Control Plan for the San Francisco Bay/San Joaquin Delta Estuary and Substitute Environmental Document (Lower San Joaquin River)

Dear Ms. Townsend:

Downey Brand represents the Tehama-Colusa Canal Authority and water service contractors within its service area (“TCCA”)¹ and submits these comments on their behalf regarding the proposed amendments to the Water Quality Control Plan for the San Francisco Bay/San Joaquin Delta Estuary (the “Bay-Delta Plan”) and the supporting proposed final Substitute Environmental Document (“Final SED”). The Notice of Public Meeting, dated July 6, 2018, describes new and revised flow objectives for the Lower San Joaquin River and its tributaries, as well as a program of implementation for these objectives (“Proposed Final Amendments”).

TCCA is a joint exercise of powers agency comprised of 17 water districts and companies that receive water from the Central Valley Project (“CVP”). The TCCA service area is made up of 150,000 acres of irrigated farmland located along the west side of the Sacramento Valley, and includes the counties of Colusa, Glenn, Tehama, and Yolo. TCCA was formed in order to operate and maintain the facilities necessary to supply water to the federal contractors within the Sacramento Canals Unit of the CVP and to preserve its members’ rights to water originating in the Sacramento Valley.

TCCA submits these comments and joins in the comments submitted on July 27, 2018 by the Northern California Water Association and its members and the Sacramento Valley Water Users, which are hereby incorporated herein by reference. In particular, TCCA notes that the Porter-

¹ For a list of the entities joining in these comments, see Attachment 1.

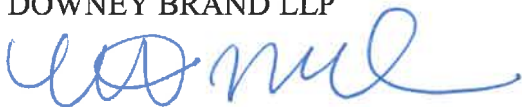
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Cologne Water Quality Control Act (“Porter-Cologne”) requires that water quality objectives include consideration of the “water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area,” balanced with the past, present, and probable future beneficial uses of water and economic considerations, among other things.² The Final SED and Proposed Final Amendments advocate for an unimpaired-flow approach that fails to adequately consider all of the factors mandated by Porter-Cologne.

TCCA urges the State Water Resources Control Board to revise and recirculate the Final SED and Proposed Final Amendments to comply with Porter-Cologne and reflect the best available science. Thank you for the opportunity to submit these comments.

Very truly yours,

DOWNEY BRAND LLP



Meredith E. Nikkel

MEN

² Water Code, § 13241.

Attachment 1Tehama-Colusa Canal Authority

Tehama-Colusa Canal Authority
Colusa County Water District
Corning Water District
Cortina Water District
Davis Water District
Dunnigan Water District
4M Water District
Glide Water District
Holthouse Water District
Kanawha Water District
Kirkwood Water District
La Grande Water District
Orland-Artois Water District
Proberta Water District
Thomas Creek Water District
Westside Water District
Glenn Valley Water District
Myers-Marsh Mutual Water Company

From: Irvine, Catharine <cirvine@downeybrand.com>
Sent: Friday, July 27, 2018 10:22 AM
To: 'LSJR-SD-Comments@waterboards.ca.gov'; WQCP1Comments
Cc: Nikkel, Meredith; Cho, Austin
Subject: Tehama-Colusa Canal Authority's Comment Letter
Attachments: TCCA Comment ltr re LSJR.pdf

Categories: Red Category

Please see attached.

Catharine Irvine
Legal Secretary to David R.E. Aladjem,
Rebecca R.A. Smith, Meredith E. Nikkel and
Sam Bivins

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