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To: Buckman, Michael@Waterboards

Subject: Comments on BOR/DWR April 18 TUCP and 4-18-14 Revised Order same date

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To take even more water from the estuary and now for agricultural uses.

The April 18 messages of concurrence from all three resource agencies – USFWS, DFW and NMFS – are uniformly vague and begging. Perhaps SWRCB staff should ask the Regional Directors and Director to verify a simple statement: “Is the proposed petition legally and ethically consistent with the standing Biological Opinions and the respective Endangered Species Acts?”

The concurrences offered with caveats such as “...consistent with the State Endangered Species Act determinations related to the DOP.” Huh? What does that “determinations related to the DOP” mean and what legal relevance does it have to the Act?

Everyone at first was led to believe it was all about human health and safety but now we find it is all about not denying agricultural demands. The loss of credibility of and confidence in the governmental agencies may be eclipsed when we find out in short order the state of the aquatic resources of the estuary.

Just today I read in the news that DWR is now going to offer 5% agricultural supply to contractors. The Board needs to take a stand and insist additional Temporary Urgency Change diversions during these fishery-damaging times be only human health and safety purposes.

The Board is the chief regulator here. The Board must ask the State and Regional agency heads to verify the concurrence without caveat, and then decide what the level of protection of beneficial uses is required.

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