



SACRAMENTO COUNTY FARM BUREAU

PUTTING THE FOOD ON YOUR FORK SINCE 1917

July 27, 2018

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

Re: Bay-Delta Plan Amendments for Flow Objectives on Lower San Joaquin River

Dear Chairperson Marcus and Members of the Board:

The Sacramento County Farm Bureau Board of Directors urge the Board to reject the proposed amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary relating to new and revised flow objectives for the Lower San Joaquin River and its tributaries.

We agree with California Farm Bureau and a large coalition of agricultural organizations, that by proposing an extraction of large volumes of “unimpaired flows” from beneficial water users, without a reasonable assurance of beneficial environmental uses, the Flow Criteria are in direct violation of the Constitution’s waste and unreasonable use prohibitions. Management efforts of recent decades show that native fish species do not need unwarranted percentages of unimpaired flows. Instead of imposing rigid percentage-based “unimpaired flows”, we should efficiently target our limited water supplies to achieve “functional flows” that can produce the greatest benefits for fish. Furthermore, we must combine intelligent “non-flow” measures with such targeted “functional flows” to address other relevant factors important to fish recovery—such as physical habitat, predation, fish passage, water temperature, and hatchery management.

Water users in the Sacramento and San Joaquin River watersheds have proposed or already begun robust voluntary collaborative efforts to accomplish exactly such an approach. Unfortunately, while the Water Board has been apparently willing to engage in ‘voluntary agreement’ talks regarding non-flow measures and the possible timing and management its proposed unimpaired flows standards, it has been unwilling to negotiate concerning its arbitrary 30- to 50- and 45- to 65-percent unimpaired flow percentages in the Sacramento and San Joaquin valley watersheds, respectively.

Additionally, the proposed amended flow objectives to increase flows into the Delta are inconsistent with the change of diversion petition advanced by Twin Tunnels proponents. Moving the diversion point for the Twin Tunnels to the North Delta will result in increased upstream diversions and reduced flows through much of the Delta, increased residency time, degraded water quality, and damage to Delta communities, agriculture, and ecosystems.

We therefore not only urge the Board to reject the proposed amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento -San Joaquin Delta Estuary, but also to reject the change of diversion petition sought by proponents of the Twin Tunnels.

Sincerely,

Lindsey Liebig
Executive Director