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March 18, 2013



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

Subject: "Comment Letter – Bay-Delta Plan SED"

Dear Ms. Townsend:

This letter is in regard to the Substitute Environmental Document (SED) in Support of Potential Changes to the Water Quality Control Plan for the San Francisco Bay-Sacramento/San Joaquin Delta Estuary: San Joaquin River Flows and Southern Delta Water Quality, as it relates to the San Joaquin Tributaries Authority and specifically the City of Turlock. As proposed, the Draft SED will have significant impact on the environment and economy of the City of Turlock and is unlikely to achieve its purported benefits to the native fishery.

The City of Turlock, like most San Joaquin Valley communities, is entirely reliant on groundwater for its potable water supply. Further, Turlock's economy is inextricably linked to agriculture – not only are agricultural commodities grown and produced in the Turlock region, but many food processors are located within the City of Turlock and are a significant source of employment.

The City is committed to the responsible stewardship of groundwater resources. Over the past few years, through various efforts, per capita demand for water has declined significantly. Indeed, the City meets or exceeds the water conservation targets established by its Urban Water Management Plan and the 2009 Water Conservation Act (SB x7-7). Turlock is an active member of the Turlock Groundwater Basin Association (TGBA). Studies prepared by the TGBA indicate that the main source of recharge to the aquifer is surface water inflows from farmland irrigation¹. Further, it appears that due to increased agricultural pumping, the Turlock Sub-basin is no longer in a state of equilibrium. Groundwater extraction is now exceeding recharge which has resulted in the development of a cone of depression east of Turlock.

The City of Turlock is a member of the Stanislaus Regional Water Authority whose sole purpose is to obtain a future surface water supply from the Turlock Irrigation District. Indeed, the implementation of the recently adopted Turlock General Plan is contingent upon obtaining a water supply from the Tuolumne River.

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Given this background and context, the proposed increase in unimpaired water flow releases will have the following adverse impacts:

- In dry years, over 120,000 acres of local farmland will be fallowed which, given the significant multiplier effect of agricultural production, will have significant impacts to the local economy. Further, the fallowing of land has potential to result in soil erosion and the degradation of surface water and air quality.
- Loss of irrigation water from available surface water supplies will result in increased pumping of diminishing groundwater resources with the potential reduction in groundwater availability to municipal and industrial users in Turlock. Further south in the San Joaquin Valley, increased groundwater pumping has resulted in subsidence which has adversely impacted efforts to increase flows in the San Joaquin Riverⁱⁱ. These potential impacts have not been studied and mitigated in the Draft SED.
- The increase in spring flows will result in the loss of a potential water supply source to municipal and industrial users in the Stanislaus Regional Water Authority – the Cities of Turlock, Modesto and Ceres.
- The increased flows will result in a loss of potential hydropower generation during the peak summer season, resulting in increased electricity costs and associated economic impacts. Further the loss of hydropower generation will result in the increased generation of electricity from non-renewable sources; this is clearly contradictory to the Global Warming Solutions Act of 2006 (AB 32).

Turlock is also concerned that the increase in river flows will not achieve the Draft SED's stated objectives. Indeed, there appears to be no scientific basis for the volume of unimpaired flow required under the Draft SED. Further, the potential change to the Bay-Delta Water Quality Control Plan ignores other water quality factors that may be impacting the health of the fishery. Turlock encourages a more comprehensive and scientific approach involving all stakeholders. Other factors that need to be considered include but are not limited to:

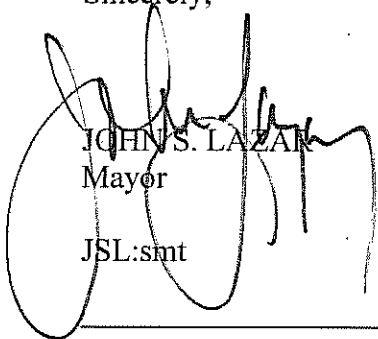
- Reduction and / or elimination of invasive species.
- Funding for water conveyance facilities so that recycled water from San Joaquin valley POTWs may be redirected to farmland irrigation and other beneficial uses.
- Improved ocean conditions, including harvesting practices.
- Modifications to pumping practices that alter the direction of water flows and adversely impact water quality in the San Francisco Bay Delta

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Finally, we are concerned that the proposed changes to the Bay-Delta Water Quality Control Plan do not ensure that the potential increase in surface water releases will actually flow to the Pacific Ocean. Unfortunately, there appears to be no mechanism to prevent the increased river flows from being redirected to Southern California via the California Aqueduct or the Delta Mendota Canal.

In closing, the City of Turlock is committed to the responsible stewardship of local water resources. Unfortunately, the Bay-Delta Water Quality Control Plan is a haphazard and flawed approach to attaining its stated objectives. We encourage the SWRCB to take a more comprehensive, scientific, and balanced approach involving all stakeholders.

Sincerely,



JOHN S. LAZAK
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JSL:smt

ⁱ Turlock Groundwater Management Plan, 2008

ⁱⁱ Sinking farmland snags San Joaquin River project, Fresno Bee 12/8/2012

<http://www.fresnobee.com/2012/12/08/3094689/sinking-farmland-snags-san-joaquin.html>