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January 10, 2017

Ms. Felicia Marcus, Chairman
State Water Resources Control Board
001 I Street, 24th Floor
Sacramento, California 95814

Dear Chairman Marcus,

The Fresno County Board of Supervisors appreciates the opportunity to comment on the Phase 1 Revised Draft Substitute Environmental Document (SED) of the State Water Resources Control Board's Bay-Delta Plan. As you know, rural counties such as Fresno County face many challenges when it comes to water supply. In light of ongoing efforts by local agencies within the major tributary areas to the San Joaquin River to comply with the Sustainable Groundwater Management Act, the suggested flow requirements in the SED could further make compliance significantly challenging, if not impossible.

The suggested increase in unimpaired flow requirements come at an inopportune time, on the heels of a multi-year drought, coupled with unreliable surface water supplies to contractors. At a macro-level, we believe the proposal fails to achieve the co-equal goals of California's water policy, by apportioning additional water to address the enhancement of the ecosystem health, at the expense of water supply reliability.

Changes to the current water supply conditions make achieving success on many fronts near impossible for rural counties. Water supply for replenishment is the cornerstone of improving drinking water supply and also for the replenishment of groundwater. The flow proposal acknowledges that the San Joaquin Water River Watershed does not produce enough water to meet both the existing human demands and those needed to support a healthy ecosystem. The primary sector expected to absorb these losses is agriculture. Drinking water supplies will also suffer but ecosystem supply will increase. We disagree with the imbalanced and inflexible nature of this proposal and strongly advocate for consideration of the human consumers of groundwater when supplies are apportioned. History has shown that increased water flows have done little to improve the environmental conditions of fish species, yet we continue down a path that ignores the destruction of the San Joaquin Valley's economy and further restricts our ability to provide safe drinking water to all human health.

Considering the many disadvantaged communities throughout the San Joaquin Valley who rely on agriculture for their economic sustainability, we call on you to reconsider the suggested flow requirements and re-evaluate this unbalanced approach in advancing the co-equal goals of California's water policy. We believe the negative impacts that will be felt by this action will far outweigh any benefits. We encourage your Board to develop a plan that is consistent with the direction outlined in Governor Brown's California Water Action Plan, the Sustainable Groundwater Management Act, and other established state policies.

Sincerely,

Brian Pacheco, Chairman

Sal Quintero, Vice Chairman

Buddy Mendes, Supervisor

Andreas Borgeas, Supervisor

Nathan Magsig, Supervisor