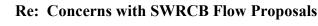


February 16, 2017



The Honorable Jerry Brown State Capitol, Suite 1173 Sacramento, CA 95814



Dear Governor Brown:



The undersigned counties throughout the Sacramento Valley are very concerned with the recent scientific basis report (Phase II) prepared by the State Water Resources Control Board as part of its Water Quality Control Plan update. We support a healthy Delta, but the approach proposed by the State Water Board will redirect impacts upstream into the Sacramento Valley and will likely fail to achieve its goal of protecting Delta water quality.



The State Water Board proposal calls for a 35-75 percent unimpaired flow into the Delta. The result would redirect significant amounts of water away from the Sacramento Valley into the Delta. The simplistic approach would go beyond what is needed for environmental needs and would result in a substantial amount of water being put out to the ocean without any benefit. This in turn would be devastating to both the economy and the environment in the counties we represent, adversely affecting the availability of critical water for cities and rural communities, farms, wildlife refuges for birds and many other species, salmon and other fisheries and recreation.



More specifically, the "unimpaired flow" approach will have two significant effects in our region:



1) Evacuate critical water in storage and prevent the diversion of water throughout our region, which will significantly affect precious water supplies for all these purposes. This is particularly true in dry years like we have seen this decade, where water available in storage is critical to helping Californians get through these challenging times. In other words, we will go backward under the State Water Board approach—not forward—in our efforts to better prepare for the next drought in California.



2) Less surface water available will lead to significant additional groundwater pumping throughout the region, which will make our efforts to implement sustainable groundwater management envisioned under the Sustainable Groundwater Management Act (SGMA) more difficult. In our region, the groundwater resources are currently sustainable and we will continue to work hard with other local agencies to assure that our precious groundwater resources remain sustainable into the future. The State Water Board proposal will make our collective efforts to achieve groundwater sustainability more difficult if not impossible.



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In sum, we encourage your administration to abandon the flawed "unimpaired flow" approach. Instead, we recommend that you pursue an integrated approach such as "functional flows," where water is used for a specific environmental purpose that is compatible with important flood protection and other water uses in the region. We believe that this  $21^{st}$  century approach to water management will better serve the Sacramento Valley and more effectively protect Delta water quality. We encourage your administration to embrace an approach that achieves your water quality goals for the Delta without redirecting impacts to the

	Sincerely,
Date	BILL CONNELLY, CHAIR Butte County Board of Supervisors
Date	GARY J. EVANS, CHAIR Colusa County Board of Supervisors
Date	KEITH CORUM, CHAIRMAN Glenn County Board of Supervisors
Date	JENNIFER MONTGOMERY, CHAIR Placer County Board of Supervisors
Date Supervisors	DON NOTTOLI, CHAIR Sacramento County Board of

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Date	DAVID A. KEHOE, CHAIRMAN Shasta County Board of Supervisors
Date	HM WHITEAVED CHAIDMAN
Date	JIM WHITEAKER, CHAIRMAN Sutter County Board of Supervisors
Date	DENNIS GARTON, CHAIRMAN Tehama County Board of Supervisors
Date	RANDY FLETCHER, CHAIR Yuba County Board of Supervisors

/ldr

cc: Nancy McFadden, Executive Secretary – Governor Brown
Karla Nemeth, Deputy Secretary for Water Policy – CA Natural Resources Agency
Felicia Marcus, Chair – State Water Resources Control Board
Bruce Babbitt, Special Advisor – CA Natural Resources Agency