CITY OF TURLOCK INC. 1908

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August 4, 2015

Ms. Felicia Marcus, Chair of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Dear Chairwoman Marcus:

I would like to express my strong concerns with the conclusions in the draft Substitute Environmental Document (SED) for the proposed Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan).

The Bay-Delta plan would require significant increases in unimpaired flows from the Merced, Stanislaus, and Tuolumne Rivers. As a city with an agriculturally based economy, the Tuolumne River's water has become the lifeblood of our local economy and is the source of direct and indirect agriculture jobs. This surface water has become critical to replenishing the local aquifer as Turlock's single largest source of groundwater recharge. Like most communities in the region, Turlock also relies solely on groundwater to serve drinking water to a population of over 70,000 residents through approximately 19,000 water service connections. This groundwater is a diminishing resource that is subject to overdraft and declining water quality and the SED conclusions jeopardize our water source more than protect it.

The Turlock Groundwater Management Plan notes a cone of depression east of Turlock that has evolved due to groundwater extraction by agricultural agencies. Groundwater quality has also declined substantially over time, which has forced Turlock to abandon a number of its municipal wells due to arsenic, nitrate, and volatile organic compound contamination.

The current course of action by the State Water Resources Control Board (SWRCB) would result in a 25% increase in groundwater pumping in the Turlock Subbasin. The SED notes that the impacts to groundwater will be "significant and unavoidable," a clear conflict with the Sustainable Groundwater Management Act of 2014. Not only is this finding irrational, it is also contrary to the goals of this Act.

As the SWRCB considers its next steps for the SED, it should be noted that Turlock has also made significant investments to solve our own problems within the subbasin, ranging from increased conservation of water, increased reuse of water, and increased access to new sources of water.

Through aggressive conservation, Turlock has been able to reduce its water use from an annual demand of 25,000 acre feet in 2004 to 20,000 acre feet in 2014—even with Turlock's significant population growth during this same period. Unfortunately, despite continued conservation efforts, an additional 10,000 acre feet of water will be needed for our residents within the next decade, far in excess of a sustainable yield for the local aquifer.

Turlock has also committed itself to not only use water once, but to reuse water as often as possible. At a substantial cost, we have added recycled water to our water supply portfolio through the implementation of tertiary wastewater treatment at the Turlock Regional Water Quality Control Facility. This water has been used for our parks, public landscapes, and sports complexes—and will now be used to irrigate agriculture through the North Valley Regional Recycled Water Project and on Turlock Irrigation District (TID) farms.

Turlock has also sought to access new water resources, specifically through the Stanislaus Regional Water Authority (SRWA) partnership of the Cities of Ceres, Modesto, and Turlock with TID. Approved by SRWA just last month, this regional surface water supply project will provide up to 30,000 acre feet of raw water for our cities to treat and drink, and will put into use a minimum of 2,000 acre feet of tertiary recycled water on our local farms. This surface water will provide clean drinking water that is critical to protect the public health and maintain quality of life for Turlock's residents.

This surface water project with TID gives Turlock an ability to diversify our water portfolio and create a sustainable, long-term plan that allows for groundwater recharge in wetter years. By lessening Turlock's need to pump groundwater—and leveraging this new access to river water—the water table will increase. This project's goal is not only to bring positive impacts to our local cities, but to make sure these impacts don't come at the cost of our surrounding farms or our own subbasin by ensuring Turlock creates a reserve of water to draw from during extended dry periods.

These efforts should prove that local control of our subbasin produces better solutions for managing our subbasin. It should also prove that the SED's findings will have negative consequences on our region. I encourage you to convene a meeting with local water resource managers, local agency staff, and local elected officials to work on common sense solutions to our water resource challenges.

Sincerely,

Gary Soiseth
Mayor
City of Turlock, California