Jehama-Colusa Canal Authority

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December 16, 2016

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

Re: Scientific Basis Report, Phase II WQCP Update

Dear Chair Marcus and Members of the Board:

The Tehama-Colusa Canal Authority (TCCA) provides the following comments on the Draft Phase II Scientific Basis Report (Draft SBR). We appreciate the efforts of the SWRCB on the Draft SBR, and the importance of this effort. TCCA is committed to rolling up our sleeves on this effort to pursue a balanced, manageable and sustainable solution for the Delta that provides for the beneficial water uses necessary to meet the needs of California's Delta, the environment, farms and communities.

However, TCCA is in agreement with the comments submitted, by and on behalf of, NCWA and other Sacramento Valley water users, contending that the unimpaired flow approach is unpractical, and unlikely to lead to the resolution of these important issues, and that such an approach is unlikely to address the expressed goals of this effort. Further, we likewise support the pursuit of a more holistic and scientifically focused approach that targets functional flows, and other restoration activities, that can be measured, and be adapted, to address the true needs of the fishery resources and other species (birds, terrestrials) that are reliant on these water resources and on the working landscapes of the Sacramento Valley. This approach is much more likely to result in success for the all environmental concerns affected by this important effort, as well as serving to protect the important beneficial water uses that fuel the economy and food production of California, the United States, and the World. The pursuit of such balanced and negotiated resolution will provide important benefits, including hopefully preventing a protracted and adversarial fight on these issues, allowing for a much more expeditious implementation of these solutions (that is certainly needed), and is likely to provide a much more sustainable and resolute agreement.

As such, TCCA hereby incorporates herein by reference, and joins in the comments and reports submitted by NCWA related to the Draft SBR.

Thank you again for the opportunity to comment on this important process. Again TCCA is committed to working towards a balanced and sustainable solution to addressing the WQCP Update, and looks forward to working towards that goal with the Board and your staff.

Sincerely,

effrey P. Sutton

General Manager