



January 19, 2024

Honorable Joaquin Esquivel, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
[SacDeltaComments@waterboards.ca.gov](mailto:SacDeltaComments@waterboards.ca.gov)

Dear Chair Esquivel and State Water Resources Control Board Members:

The above organizations write to express our support for, and to encourage your approval of, the **Agreements to Support Healthy Rivers and Landscapes** as the alternative for updating the Bay-Delta Water Quality Control Plan.

On March 29, 2022, the Governor announced broad agreement on measures to provide additional water flows and new habitat to help improve conditions in the Sacramento-San Joaquin River Delta watershed. This agreement, referred to as the Healthy Rivers and Landscapes proposals, are the result of over five years of collaboration among the California Natural Resources Agency, the California Environmental Protection Agency, water agencies from throughout the state, and other stakeholders with the purpose of developing a modern approach to protecting all beneficial uses of water in the Bay-Delta watershed.

As statewide organizations representing many of the important uses of water in California, we encourage you to incorporate and advance a new approach in the updated Delta water quality standards to protect *all* beneficial uses of water important to California in the face of climate adaptation. These important uses of water include water supplies for millions of Californians, the fourth largest economy in the world; our farms and ranches that feed and clothe the state, nation, and world; our vital fish and wildlife; recreation; and hydroelectric power generation that is essential to California's resilient energy grid. We believe that the Agreements to Support Healthy Rivers and Landscapes provide the balance necessary to protect all beneficial uses of water. On the other hand, the unimpaired flow approach would be devastating to California and all of the beneficial uses described.

We have appreciated the State Water Resources Control Board's (State Water Board) comprehensive process to update and implement the Bay-Delta Water Quality Control Plan and we have benefitted from the recent three hearings and related efforts to evaluate the alternatives in the draft staff report. After reviewing the staff report in detail and listening to the various commentators and discussions around the alternatives, we believe the Agreements to Support Healthy Rivers and Landscapes alternative provides *more benefits and fewer impacts*

than the unimpaired flow alternative and therefore should be adopted by the State Water Board as the best alternative for meeting the policy, technical and legal objectives for the Bay-Delta Plan update.

Our organizations are increasingly concerned about water insecurity and rising water rates, each of which compound other factors making California less affordable to the average person. Imposing an unimpaired flow requirement of 55% would only serve to make these problems worse by creating additional scarcity. The Healthy Rivers and Landscapes alternative proposes a way to meet environmental needs *and* the needs of our communities and economy.

The agreements use both flow and non-flow measures that help support native species and the environment. The agreements also create a governance structure that oversees implementation and assists in decision-making. This governance structure encourages conversation, collaboration, and rapid response to changing conditions. In addition, the more reasonable flow measures assist in ensuring that water users of all types can better predict water availability and plan accordingly.

For example, developers can better model water availability to serve new housing developments, which are legally required to provide proof that water will exist to serve the planned project. Also, agricultural businesses can better plan for the appropriate acreage to plant, and this increased certainty helps support related businesses. In short, the Healthy Rivers and Landscapes alternative supports both the environment and the economy, and both of these are critical to life in California today and in the future.

We appreciate urge the State Water Board to approve the Healthy Rivers and Landscapes proposal as the best alternative for the Bay-Delta Plan update and to satisfy the State Water Board's responsibility to reasonably balance the many factors involved in updating the Bay-Delta Plan.

Thank you for your consideration of these comments.

Sincerely,



Brenda Bass  
Policy Advocate  
California Chamber of Commerce

On behalf of:

Agricultural Council of California, Tricia Geringer  
CalCIMA, Robert Dugan  
California Building Industry Association, Dan Dunmoyer  
California Chamber of Commerce, Brenda Bass  
California Farm Bureau, Alexandra Biering  
California Food Producers, Katie Little  
California Manufacturers & Technology Association, Robert Spiegel  
California Municipal Utilities Association, Andrea Abergel  
Dairy Institute of California, Katie Davey  
Western Growers, Gail Delihant