



January 10, 2025

Via Email: SacDeltaComments@WaterBoards.Ca.Gov

Mr. Erik Ekdahl, Deputy Director
 Division of Water Rights
 State Water Resources Control Board
 1001 I Street, 24th Floor
 Sacramento, CA 95814

Subject: Comment Letter – Draft Sacramento/Delta Bay-Delta Plan Updates

Dear Mr. Ekdahl:

The California Chamber of Commerce (CalChamber) and undersigned organizations appreciate this opportunity to comment on the Sacramento/Delta draft Program of Implementation (POI) for the update to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Watershed. The Coalition appreciates the extensive work of the State Water Resources Control Board (State Water Board) and its staff to reach this point as well as the transparency employed in this process. Unfortunately, the

Coalition writes to express our substantial concerns with the unimpaired flows approach detailed in the POI. This approach would substantially reduce water supply reliability for industries dependent on the Bay-Delta watershed, leading to negative and unmitigated consequences for California's economy. As representatives of beneficial users of water that the State Water Board is legally required to consider in the update to the Bay-Delta Water Quality Control Plan (Bay-Delta Plan), we believe the unimpaired flows approach falls woefully short of protecting the industries we represent. At the same time, we recognize that it is paramount for the Bay-Delta Plan update to correct the decades-long decline of many protected species within this watershed. The health of this ecosystem is intrinsically linked to its economic viability, and we have a vested interest in ensuring the sustainable management of this critical resource. That is why we continue to advocate for the State Water Board to incorporate and advance the Agreements to Support Healthy Rivers and Landscapes program (HRL program) in the updated Delta water quality standards, as this approach, developed with the leadership of Governor Newsom and his administration, provides the balance necessary to protect all beneficial uses of water.

CalChamber is the largest broad-based business advocate to government in California, representing more than 13,000 businesses that collectively employ one-fourth of the private sector workforce in California. The additional undersigned organizations represent a diverse range of industries and agencies throughout the state, including water agencies, agriculture, housing development, manufacturing, technology, and more. The Coalition collectively represents nearly every major business sector that would be directly impacted by the current update to the Bay-Delta Plan.

The Bay-Delta serves as the transition point between Northern California's water-rich regions and the drier central and southern parts of the state. It is also the hub of California's two largest surface water delivery projects, the State Water Project and the federal Central Valley Project, which provide water to more than 30 million Californians in the Bay Area, Central Valley, and Southern California. The Bay-Delta watershed also supports California's highly productive agricultural sector, providing water that irrigates 4 million acres of farmland, which provides a significant portion of the State and Nation's fruits, fibers, and vegetables. Water is a foundational resource for California's economy, and this watershed is critical to support a state that represents the fifth largest economy in the world. A reliable water supply is essential for California's industries, as it helps sustain economic productivity, environmental sustainability, and public well-being. Key sectors of California's economy depend heavily on consistent access to water. Additionally, an affordable transition to clean energy also depends on reliable hydropower, which is highly influenced by water operations. Regulatory certainty around water policy that balances the environmental and economic needs of California is critical for businesses to make long-term investments and mitigate disruptions.

The unimpaired flows approach would result in significant uncertainty in the implementation of water rights and raises questions about whether the state could continue to meet its water demands, particularly given the worsening challenges to water supply reliability that climate change is likely to present. In addition to reducing water supply for agricultural and municipal uses, the POI does not provide many details on how the unimpaired flows approach would be implemented and how it can fairly balance beneficial uses.

The Coalition believes that the State Water Board must carefully consider how this approach will impact cost of living and economic stability for tens of millions of Californians. While California represents one of the world's strongest economies, affordability challenges significantly burden working and middle-income families. This crisis of affordability is an immediate threat to the state, and the unimpaired flows approach would likely exacerbate this problem. Its negative impacts would result in rising food and energy costs, slow housing production, limit job creation, reduce investment in infrastructure to improve water security, increase water rates, and much more.

For the reasons described below, we respectfully request that the State Water Board incorporate the HRL program into the Bay-Delta Plan update.

The Coalition represents beneficial users of water that the Porter-Cologne Water Quality Control Act requires the State Water Board to consider in updating the Bay-Delta Plan

The State Water Board has a legal obligation to balance beneficial uses of water under the Porter-Cologne Water Quality Control Act, including when updating Water Quality Control Plans. This responsibility is fundamental for ensuring that water resources are allocated and managed to serve diverse needs. These beneficial uses include agricultural, urban and municipal, environmental, and industrial uses. Balancing these uses involves weighing competing demands for water while ensuring compliance with water quality

standards to meet the goals of human and ecological systems. In establishing water quality objectives, existing law details factors the State Water Board must consider, including “[p]ast, present, and probable future beneficial uses of water,” “economic considerations,” and “[t]he need for developing housing.”¹ In establishing water quality objectives in water quality control plans, the State Water Board must “ensure the *reasonable* protection of beneficial uses” (emphasis added).² This means ensuring that the benefits of environmental protections are balanced against potential economic burdens, avoiding unreasonable harms to industries or communities or affording absolute protection of one use over another.

This legal requirement reflects the Legislature’s intent to achieve a balanced approach to water management, ensuring that water quality objectives promote sustainability without imposing disproportionate economic costs.³

As noted above, the Coalition includes a diverse group of industries that support California’s economy, such as:

- **Agriculture:** California, as the leading state in the value of sales from agricultural production, is critical to supporting a global food supply chain. Most of the agricultural water use in California is within the Sacramento/Delta watershed and San Joaquin Valley regions.
- **Manufacturing:** Many manufacturing processors, such as food production, semiconductor fabrication, and beverage production, require large volumes of clean water.
- **Technology:** Many technology companies make use of cooling towers that require large amounts of water to cool servers and computer equipment.
- **Real estate development:** New housing development requires assurances that local water suppliers would have the supplies necessary to service new connections. Much of the affordable housing regions in the State are reliant on Delta water supplies.
- **Tourism and recreation:** California is home to some of the most popular tourist destinations in United States with industries, such as hotels and amusement parks, that require significant amounts of water.
- **Energy production:** Hydropower plants in California depend on sufficient river flows at times of high demand from the Bay-Delta watershed.

The Coalition represents either beneficial users of water or industries reliant on beneficial users. An analysis of a water quality control plan that reveals unreasonably high costs on California’s economic sector is an indication that the proposed plan is untenable.

While the State Water Board’s own modeling reveals there could be severe water rationing in some years under the unimpaired flows approach that could have significant economic consequences, its true repercussions are likely understated.

As detailed in the State Water Board’s 2023 Draft Staff Report, the water supply and economic impacts of the unimpaired flows approach are substantial, totaling many hundreds of thousands of acre-feet and hundreds of millions of dollars. At the same time, analyses from other entities show that these impacts may be far greater than the report predicts. Detailed below are examples of how the unimpaired flows approach will impact various regions of California.

San Joaquin Valley

Excess surface water supplies during wet years play a key role in addressing some of the most severe challenges to the San Joaquin Valley. These supplies help offset reduced groundwater pumped under the Sustainable Groundwater Management Act (SGMA), restore migratory bird and fish habitats, address safe drinking water, and improve groundwater recharge and storage.

The Draft Staff Report analysis of the 55 percent unimpaired flows approach estimates that the annual Sacramento/Delta water supply to the San Joaquin Valley region would be reduced on average from 96 thousand acre-feet (TAF) in wet years to 707 TAF in dry years.⁴ This would mean an average reduction in

¹ Water Code Section 13241, subd. (a), (d), and (e).

² Water Code Section 13241.

³ Water Code Section 13000.

⁴ State Water Resources Control Board. 2023. *Draft Staff Report*, Page 6-72.

deliveries of more than 22 percent to San Joaquin Valley urban users. Less water applied for irrigation of agricultural lands would in turn result in reductions of incidental groundwater recharge and decreased groundwater levels compared to baseline conditions.⁵ An average of 624 TAF of additional groundwater pumping would be necessary to make up for lost surface water deliveries under the unimpaired flows approach, which would significantly undermine the ability of groundwater sustainability agencies to reach the sustainability goals of SGMA.

The combined costs of SGMA and the unimpaired flows approach would ravage the San Joaquin Valley economy. The Public Policy Institute of California estimates that in the worst-case scenario, SGMA will result in nearly 900,000 acres of fallowed farmland, almost 50,000 jobs would be lost, and regional economic activity would decline by 2.3 percent. The average water supply reduction from the unimpaired flow approach would result in an additional 140,000 acres being fallowed. In a dry year, the unimpaired flows approach would result in more than 260,000 acres being fallowed. Water supply reductions from the unimpaired flows approach would also exacerbate job losses in the region.

Bay Area

More than 50 percent of the Bay Area's water supply comes from the Delta. The Draft Staff Report estimates a 28 percent reduction in State Water Project deliveries and a 15 percent reduction in Bay Area regional municipal supplies. Water agencies in this region believe it's likely that the Draft Staff Report severely underestimates reductions in water supplies under the unimpaired flows approach.

According to a report commissioned by the East Bay Municipal Utility District (EBMUD), under a baseline scenario of its current drought management program, by 2050, demand will exceed supply in one out of eight years, causing demand rationing of 9 percent on average in those years.⁶ It's estimated that this level of rationing results in \$3.3 million in costs to customers on average in each such year. Under the 55 percent unimpaired flows scenario, by 2050, demand would exceed supply in one out of every two years, causing 25 percent demand rationing on average in those years. This rationing would lead to approximately \$181 million in costs to customers on average in every such year. In the worst drought year, demand would be rationed by over 88 percent in this scenario, leading to customer costs of more than \$1.875 billion.

The report's estimates of job and business sale losses further underscore the severe economic consequences of the unimpaired flows scenario. Under the baseline management scenario, by 2050, it's estimated that the projected 9 percent average demand rationing in years with at least 3 percent supply shortfall would result in an average of 3,084 jobs lost and \$800 million in lost business sales for each such year. Under the 55 percent unimpaired flows scenario, it's estimated that demand rationing of 25 percent would lead to an average of 42,616 jobs lost and \$7.53 billion in lost business sales for each such year. In the worst drought year, its estimated than 88 percent demand rationing would lead to a loss of more than 333,000 jobs and \$56.05 billion in lost business sales.

Solano County, one of the fastest growing counties in the Bay Area with a robust agricultural sector, would be uniquely impacted by the unimpaired flows approach. The county estimates that up to 75 percent of its water from Lake Berryessa, the primary source of water for the county, could be curtailed in drought years under a 55 percent unimpaired flows scenario.⁷ Like many regions, Solano County would have few economically feasible alternatives to help meet its water supply needs.

Southern California

A significant portion of the water delivered through the State Water Project supports Southern California, where major urban centers and industries are located. The Metropolitan Water District of Southern California (MWD), which supplies water to approximately 19 million people, relies heavily on the State Water Project for its water needs, including for addressing water quality issues of the Colorado River and groundwater basins, direct supplies, and for a source of recyclable water. MWD has made significant investments in storage, groundwater recharge projects and recycled water projects, and State Water Project deliveries are critical to the viability of these projects. A significant portion of MWD's service area

⁵ State Water Resources Control Board. 2023. *Draft Staff Report*, Page 6-81.

⁶ Sunding, D. L. and O.R. Browne. 2022. *The Economic Impacts of Water Shortages in the EBMUD Service Area*.

⁷ <https://www.fairfield.ca.gov/government/city-departments/city-manager-s-office/bay-delta-plan>.

relies exclusively on supply from the State Water Project, and it would be economically infeasible to replace water lost under the unimpaired flows approach.

The Draft Staff Report estimates a 25 percent reduction in Southern California water supplies under an unimpaired flows approach. To replace this reduced supply in surface water deliveries would require the equivalent of nine new desalination facilities with the capacity of the Carlsbad Desalination Plant. The Draft Staff Report estimates the costs to replace Southern California's reduced water supply at more than half a billion dollars annually,⁸ a financial impact that MWD does not believe the region can absorb. The significant costs of mitigation measures necessary to offset reduced supply, such as water recycling, conservation, and water transfers, would greatly exacerbate water affordability challenges on individual ratepayers and disproportionately impact many disadvantaged communities in the region, most of whom reside in this region.

The unimpaired flows approach would worsen California's housing crisis

California's ongoing housing shortage is driving home prices and rental prices to record highs and contributing to the state's homelessness crisis. The Newsom Administration and the California State Legislature have made housing production a top priority for the past several years, with the Newsom Administration setting a statewide production goal of roughly 2.5 million new units by the end of the decade. That equates to roughly 315,000 units per year. Nonetheless, California has continuously fallen well short of that goal year over year. Adequate water supply is an important component of facilitating housing development, and in many regions of the state, the unimpaired flows approach would increase development costs or halt development altogether. Many of the regions that can support affordable housing receive water from the Delta watershed.

Existing law requires housing developers to demonstrate that sufficient water is available to service new connections before proceeding with construction.⁹ Local water suppliers must prepare a Water Supply Assessment (WSA), which evaluates whether sufficient water supplies are available over a 20-year horizon under normal, dry, and multiple dry year conditions. A water agency's written assessment of its ability or inability to provide sufficient water supply to service a proposed development must be supported by "substantial evidence."¹⁰ The WSA must be included in the project's Environmental Impact Report under the California Environmental Quality Act (CEQA). CEQA mandates that environmental impacts, including water supply issues, be assessed and mitigated as part of the project approval process. If a project's water supply is insufficient, the lead agency may require developers to identify additional sources, implement conservation measures, or scale down the project. Local governments are prevented from approving large subdivisions without confirmation that adequate water supply is available.

As detailed above, the unimpaired flows approach would often impair or prevent water suppliers from meeting *existing* residential water supply demands in many regions of the state. Changing water conditions in the Bay-Delta watershed would make it harder for water purveyors to have confidence in issuing WSAs that demonstrate an ability to service new housing developments, given the uncertainty of annual water supplies under the unimpaired flows approach. These challenges would likely be especially prominent in regions where SGMA may require groundwater pumping restrictions.

Where a water purveyor would need to develop new supplies to service the proposed development, the WSA must include detailed information, including the source of the new water, the financing for any capital outlays required, the securing of applicable federal, state, and local permits for infrastructure necessary to deliver the water, and any necessary regulatory approvals. It is difficult to assess how many water suppliers could obtain new water supplies necessary to meet new demands under an unimpaired flows approach. The high costs of developing new supplies, whether through investments in storage, recycled water projects, or water transfers, would be passed on to ratepayers as well as developers, increasing housing costs. It may also be difficult for water agencies to secure the financing necessary to invest in infrastructure projects to service new development if the new water supplies are not reliable. Where these projects are

⁸ State Water Resources Control Board. 2023. *Draft Staff Report*, p. 8-101, Table 8.5-8, 55% Unimpaired Hydrograph Alternative.

⁹ California Government Code, Section 66473.7, Subd. (b)., California Water Code, Sections 10910-10915.

¹⁰ California Government Code, Section 66473.7, Subd. (c).

impractical and reliable water transfers are unavailable, water agencies would be unable to provide developers with necessary water supply assurances, potentially leading to building moratoriums.

Reduced housing production would lead to fewer construction jobs and make it more difficult for companies, particularly those in high cost-of-living areas, to hire new workers. More Californians would be forced to commute farther to work, adding more air pollution and traffic congestion, and reducing worker productivity and quality of life. Meanwhile, the costs of home prices and rents could continue to soar.

The mitigation measures the State Water Board has suggested, like investing in more recycling, groundwater extraction, surface water transfers, and conservation, for example, are infeasible at the scale and within the timeframe that would be required to offset the impacts of reduced surface water availability under the unimpaired flows approach

Mitigation measures to assist with implementation of the Bay-Delta Plan include groundwater recharge and storage, water transfers, recycled water, water conservation, and desalination, where appropriate. Conservation by itself will not be enough in certain regions to help meet the projected reductions in potable water supply as a result of the Bay-Delta Plan implementation. Additionally, these projects often face the same sort of opposition as other water development projects and can take decades to plan and construct.

Much of the state has spent decades implementing conservation measures with great success. Between 1990 and 2020, daily per capita water use in California declined by 37 percent, from 217 gallons to 136 gallons. Over the past 20 years, the Santa Clara Valley Water District supported a 25 percent population increase while decreasing total water use by eight percent. MWD has implemented conservation programs to reduce per capita potable water consumption in Southern California by about 40 percent since 1990. In fact, the total amount of urban water used statewide has plateaued over the last decade despite an increase in the state's population. California uses roughly the same total amount of urban water now as it did in 1990. However, conservation efforts are expensive and often financed by ratepayers. For example, since 1990, MWD has spent \$900 million on conservation messaging, water fixture replacement, and turf removal.

The vast majority of cost-effective conservation measures have already been implemented and the fruits of these efforts have been realized. Continuing to reduce per capita water use to levels necessary to offset the impacts of the unimpaired flows approach would be extraordinarily expensive and significantly increase water rates. It would go beyond the requirements in the Long-Term Conservation Framework, which will already be challenging for many utilities and their customers. It is also unlikely significant investments in conservation measures could successfully offset reduced surface water deliveries.

Reduced water supplies would increase costs per acre-foot of Central Valley Project and State Water Project water. It would also require water agencies to invest in more expensive alternative supply sources, increasing the cost of water. Groundwater banking and recharge, recycled water, and desalination are high-cost projects with infrastructure that may not currently be in place to adequately replace the Delta supplies. In some cases, these represent completely different sources of potable water for agencies that will need time and funding to put these measures in place to replace the supply. The high costs of these projects, in combination with potential increased operational costs, will lead to direct economic impact and higher rates for customers. The Draft Staff Report includes unrealistic expectations for how quickly regional water resiliency projects could come online to offset these impacts and underestimates the financial costs of these projects.

The unimpaired flows approach, as detailed in the POI, lacks the clarity and predictability necessary to maintain economic stability

The Bay-Delta Plan includes a POI, which outlines the measures, schedule, and monitoring necessary to implement the Water Quality Control Plan for the Bay-Delta. Currently, the POI is in draft form and is being refined based on public comments and additional information. This is a critical component of the overall plan that could still change and will have a direct impact on available potable water supply.

The unimpaired flows approach in the POI seemingly allows for sudden changes with reduction or ceasing of diversions. This could quickly lead to unplanned changes in available water supply downstream for potable water customers. Sudden, unplanned changes to potable water supply that cannot be covered through conservation and available alternative water projects will likely lead to regional water shortages,

intensified competition for remaining resources, and higher rates to maintain system operations, which will put increased pressure on customer affordability. Uncertainty in yearly supply may also lead to development restrictions that could limit economic growth. The success of the new Bay-Delta Plan would be evaluated every year, with major reviews after 5 and 10 years. These timelines would allow for whole water seasons to be missed if it is recognized that less water should have been unimpaired. Given that rainfall patterns change each year, this will likely lead to missed opportunities to use available water.

As it relates to the unimpaired flows approach, the POI leaves unanswered many questions that include but are not limited to:

- How would the unimpaired hydrograph be calculated on a 7-day running average?
- How would every water user know what they may divert every day as the hydrograph constantly changes, as does regulatory obligations?
- How would the State Water Board enforce?
- How would stored water releases be protected from unlawful diversion?
- How would cold water be protected as significant flows are bypasses to the ocean rather than being stored for future use?

The unimpaired flows approach also includes many undefined implementation variations with the potential for significant environmental, economic, water supply, and energy grid impacts. Although it is not stated in the POI, all variations in storage and flow schedules would require further environmental compliance and cannot be implemented flexibly or easily. Additionally, not all tributaries have access to unimpaired flow data, which would further compound the uncertainty and unreliability for water users.

While the unimpaired flows approach would have devastating effects on water users and California's economy, the Agreements to Support Healthy Rivers and Landscapes program provides the balance necessary to protect all beneficial uses of water

The HRL program is critical to help balance the goals of the Bay-Delta Plan and needed flows for potable water supply. If finalized, these Agreements need to be integrated into the POI, so they are implemented properly and incorporated into the other parts of the Bay-Delta Plan. These Agreements will balance the needs of existing users of the Delta water supply and help reduce the overall economic impact of the Bay-Delta Plan by reducing the need for investment in alternative water supplies. The approach was subject to several peer-reviews and considers all of the various constraints and opportunities to balance all beneficial uses.

The HRL program goes beyond simply adding flow to streams and, instead, addresses the underlying ecosystem functions needed to restore fish populations. One of the critical aspects of the HRL program is the dedication of significant flows for the environment coupled with landscape-scale restoration. This approach, rather than using only flows, focuses on maintaining functions of a river that support ecosystem health, such as sediment movement, water quality, and timing flows based on species migration and reproduction. These flows, coupled with suitable habitat, promote the benefits to fish and wildlife, which is why the HRL program includes major investments in habitat restoration projects. Scientific study on the matter shows that a combination of habitat and flow provides substantial systemwide benefits. Additionally, the Public Policy Institute of California (PPIC) has touted the value of this approach, stating that “[b]y coupling physical habitat improvements with key aspects of flow variability, functional flows offer a more effective means of improving ecosystem health than conventional approaches.”

To ensure these efforts are having their desired effect on the Delta watershed, the HRL program would promote transparency and accountability through a collaborative science program that relies on the latest, best available knowledge and an inclusive governance structure that encourages conversation, collaboration, and rapid response to changing conditions. One of the key features of this program is adaptive management, which would allow parties to implement the program, monitor progress, and make real-time adjustments based on the latest data. Finally, the parties to the agreements are committing more than \$2.9 billion to fund a robust science program, construct new habitat, water purchases, crop idling, and other actions.

The more reasonable flow measures in the HRL program would 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. Overall, this alternative minimizes negative impacts on the economy while achieving ecosystem benefits.

Conclusion

Once again, we appreciate the years-long effort of the State Water Board and its staff to undergo this process and consider a Bay-Delta Plan update that provides reasonable protections to environmental and consumptive uses of water. We provide these comments to help the State Water Board better understand our concerns with the unimpaired flows approach and why the HRL program provides for more holistic management of the Bay-Delta watershed. The unimpaired flows approach leaves too many unanswered questions on an issue that requires clarity and careful balancing by the State Water Board and the certainty for respective agencies who will be responsible for implementing its requirements while ensuring clean, affordable water supply for California's communities, farms, and businesses. These questions make it impossible for immediate implementation of the unimpaired approach, whereas the HRL approach can be implemented immediately upon adoption by the State Water Board.

Not only would the negative consequences of the unimpaired flows approach reverberate throughout local economies in California, this approach would fail to improve the state of ecosystems in the Sacramento/Delta watershed. In the past, flow-only efforts to manage the Bay-Delta have not worked as desired. In the intervening decades, both species and water supply reliability have declined in the Bay-Delta and, by extension, throughout much of the state. The HRL program changes course and offers a different approach that is innovative and aims to improve environmental conditions more quickly and holistically than traditional top-down regulatory requirements.

As we look to balance the needs of the environment and our broader economy, we urge the State Water Board to adopt HRL as a solution that provides certainty to California residents and businesses while also immediately advancing key protections for the environment.

For questions about our comments, please contact Kristopher Anderson, Policy Advocate with the California Chamber of Commerce, at kristopher.anderson@calchamber.com.

Sincerely,



Kristopher M. Anderson
Policy Advocate
California Chamber of Commerce
on behalf of

Agricultural Council of California, Tricia Geringer, Vice President, Government Affairs
American Pistachio Growers, Zachary Fraser, President & CEO
Bay Area Council, Adrian Covert, Sr. Vice President, Public Policy
Brea Chamber of Commerce, Lacy Schoen, President & CEO
California Building Industry Association, Dan Dunmoyer, President & CEO
California Business Properties Association, Matthew Hargrove, President & CEO
California Citrus Mutual, Casey Creamer, President
California Farm Bureau, Alexandra Biering, Director, Policy Advocacy
California Food Producers, Katie Little, Director, Government Affairs
California Manufacturers & Technology Association, Dawn Koepke, Partner
California Municipal Utilities Association, Andrea Abergel, Director of Water
California Walnut Commission, Robert Verloop, Executive Director & CEO
California Water Association, Jennifer Capitolo, Executive Director
California Water Service, Ken Jenkins, Vice President, Water Resources Planning and Sustainability
Chino Valley Chamber of Commerce, Zeb Welborn, President & CEO

Desert Water Agency, Steve Johnson, P.E., General Manager
Elsinore Valley Municipal Water District, Greg Thomas, General Manager
Greater Conejo Valley Chamber of Commerce, Danielle Borja, President & CEO
Greater Coachella Valley Chamber of Commerce, Brandon Marley, President & CEO
Groundswell for Water and Housing Justice, Martin Ludlow, Founder
Kern County Water Agency, Thomas D. McCarthy, General Manager
La Cañada Flintridge Chamber of Commerce, Pat Anderson, President & CEO
Lake Elsinore Valley Chamber of Commerce, Kim Joseph Cousins, President & CEO
Livermore Valley Chamber of Commerce, Sherri Souza, President & CEO
Milk Producers Council, Cornell Kasbergen, President
Modesto Irrigation District, Jimi Netniss, General Manger
Murrieta/Wildomar Chamber of Commerce, Patrick Ellis, President & CEO
Orange County Business Council, Jeffrey Ball, President & CEO
Palos Verdes Peninsula Chamber of Commerce, Eileen Hupp, President & CEO
Rancho Cucamonga Chamber of Commerce, Heather Rawlings-Polk, Executive Director
Roseville Area Chamber of Commerce, Rana Ghadban, CEO
Santa Barbara South Coast Chamber of Commerce, Kristen Miller, President & CEO
Santee Chamber of Commerce, Kristen Dare, President & CEO
Solano County Water Agency, Chris Lee, General Manager
Southern California Water Coalition, Charles Wilson, Executive Director
Southwest California Legislative Council:
 Patrick Ellis, President & CEO, Murrieta/Wildomar Chamber of Commerce
 Brooke Nunn, President & CEO, Temecula Chamber of Commerce
 Kim J. Cousins, President & CEO, Lake Elsinore Chamber of Commerce
 Katie Luna, President & CEO, Menifee Valley Chamber of Commerce
 Kevin Saunders, Executive Director, Hemet/San Jacinto Valley Chamber of Commerce
Torrance Area Chamber of Commerce, Donna Duperron, President & CEO
Vacaville Chamber of Commerce, Debbie Egidio, President & CEO
Valley Ag Water Coalition, Bob Reeb, Executive Director
West Ventura County Business Alliance, Andy Conli, President & CEO
Western Growers Association, Gail Delihant, Sr. Director, CA Government Affairs
Western Plant Health Association, Renee Pinel, President & CEO
Western United Dairies, Anja Raudabaugh, CEO
Woolf Farming and Processing, Ross Franson, President

cc: The Hon. Wade Crowfoot, Secretary for Natural Resources, California Natural Resources Agency
The Hon. Yana Garcia, Secretary for Environmental Protection, California Environmental
Protection Agency
The Hon. E. Joaquin Esquivel, Chair, State Water Resources Control Board
The Hon. Dorene D'Adamo, Vice Chair, State Water Resources Control Board
The Hon. Laurel Firestone, Member, State Water Resources Control Board
The Hon. Sean Maguire, Member, State Water Resources Control Board
The Hon. Nichole Morgan, Member, State Water Resources Control Board
The Hon. Charlton Bonham, Director, California Department of Fish and Wildlife
The Hon. Karla Nemeth, Director, California Department of Water Resources
Eric Oppenheimer, Executive Director, State Water Resources Control Board
Brady Borcharding, Deputy Legislative Affairs Secretary, Office of Governor Gavin Newsom
Jennifer Barrera, President & Chief Executive Officer, California Chamber of Commerce
Ben Golombek, Executive VP & Chief of Staff for Policy, California Chamber of Commerce

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