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March 9, 2013

State Water Resources Control Board
c/o: Jeanine Townsend, Clerk to the Board
P.O. Box 100
Sacramento, CA 95814-0100

Re: Comment Letter – Bay-Delta Plan SED

To: State Water Resources Control Board

If approved, your staff proposal requiring the Merced, Tuolumne and Stanislaus rivers to dedicate 35% unimpaired flow to fish and wildlife would devastate San Joaquin, Stanislaus and Merced Counties.

Our region is struggling to regain its economic footing after a protracted recession. We cannot afford to fallow our prime agricultural land, sacrifice hundreds of jobs and suffer a $187 million dollar hit to agricultural income in dry years. This proposal is further magnified by drought which we are in the early stages of as I write this letter.

This proposal would also adversely impact hydropower generation in our region by taking water from reservoirs during the spring when there is minimal power demand. This would leave less water available during the summer months when power is needed to meet peak consumer power demand and water is critically needed to irrigate crops.

The proposal is divisive and conflicts with the Delta Stewardship Council's efforts and the Bay Delta Conservation Plan, a holistic solution championed by many state leaders from both political parties.

More importantly however, this ill-conceived plan is based on the ASSUMPTION that it will help restore the Delta's fisheries. This assumption is not supported by science or evidence. Rather, the proposal presents unilateral demand without quantifying the benefit or goal to be achieved.

Before imposing a plan that carries such serious consequences for our region, the Board must first implement non-flow measures. Given the scarcity of water in California, non-flow measures such as predator suppression must be put in place before the State Water Board puts family farms and related industries out of business.

I strongly urge that the Board reject this onerous proposal.

Sincerely,

David S. Absher
President