Public Hearing (3/20/13)
Bay-Delta Plan SED
Deadline: 3/29/13 by 12 noon

CERES
CHAMBER OF COMMERCE
2491 Lawrence Street Ceres, CA 95307 • (209) 537-2601

LATE COMMENT

RECEIVED
3-29-13
8:54pm
SWRCB Clerk

March 27, 2013

To: State Water Resources Control Board

If approved, your proposal requiring the Merced, Tuolumne, and Stanislaus rivers to dedicate 35 percent of 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 lingering recession, and we cannot afford to fallow our land, lose hundreds of jobs, and weather a $187-million hit to agricultural income in dry years.

This proposal would also adversely impact hydropower production in our region by taking water from reservoirs during the spring, leaving less water available in summertime; when it is critically needed to irrigate crops and help relieve strain on the state's power grid.

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.

Most importantly, however, this ill-conceived plan is based on an *assumption* that it will help restore the Delta's native fisheries. This assumption is not supported by science or evidence. Rather, the proposal presents unilateral demands 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 regional family farms out of business.

We strongly urge the Board to reject this proposal.

Sincerely,

Dustin Pack, President

Shane Parson, Board Member

Jay Simmonds, Board Member

Krista Knight, Board Member

RESOLUTION

Whereas, the State Water Resources Control Board's Draft Substitute Environmental Document (SED) proposes to require the Stanislaus, Tuolumne, and Merced Rivers release 35 percent of unimpaired flow from February to June each year; and

Whereas, the proposed requirement will create "**significant and unavoidable**" impacts to the economy, agriculture, and groundwater basins in Stanislaus, San Joaquin, and Merced Counties; and

Whereas, those impacts include approximately $69 million in economic impacts in an economically distressed region of our state, including $23.5 million to Merced Irrigation District, $30 million to Turlock Irrigation District, and $15.5 million to Modesto Irrigation District each year; and

Whereas, the impacts result in a loss of $4.5 million in energy revenue every year including $1.5 million to each of the Merced, Turlock, and Modesto Irrigation Districts; and

Whereas, the proposed requirement would fallow approximately 128,295 acres of prime farm land and result in the loss of over 800 family farms in the region; and

Whereas, the proposed requirement will result in over-drafted groundwater basins; and

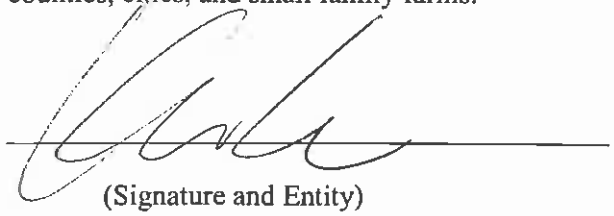
Whereas approximately 460 jobs will be permanently lost including 160 in Merced Irrigation District, 200 in Turlock Irrigation District, and 100 in Modesto Irrigation District; and

Whereas, the proposed requirement will not benefit native fish populations or promote ecosystem restoration; and

Whereas, the proposed requirement ignores non-flow alternatives that are less costly and more effective; and

Whereas, the proposed requirement compromises attaining the dual goals of ecosystem restoration and water supply reliability under SB7x-7.

BE IT THEREFORE RESOLVED that the State Water Resources Control Board should pursue a comprehensive solution that is consistent with the timing of the overall comprehensive Delta planning process and which takes into account the potential impact on hydroelectric energy generation. This solution must prioritize non-flow measures to protect native fish species, such as predation reduction programs, before demanding flow increases that would threaten the economic vitality of these California counties, cities, and small family farms.



(Signature and Entity)

3/28/13

(Date)