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

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Thursday, March 28, 2013

State Water Resources Control Board

"Comment Letter - Bay Delta Plan SED"

It is time for a reality check. In 25 years the world population will surpass 8 billion and headed for 9 billion. California population may achieve 44 million people. Will California be a part of the global solution for a needed food supply or will we walk away from the gift we currently have to become a significant burden, dependent on imported food stuffs. Our failure impacts not just California but the entire United States. In our region of California which the Bay Delta SED proposal impact, has a natural water cycle with natural ground water recharge and a sophisticated man made infra-structure for water delivery to agriculture, shared with an extensive recreation system and increasing delivery of surface water to cities. All this coupled with suitable climate fertile soils and 150 years of ingenuity provide an unsurpassed beneficial use of water. Something inadequately defined in the SED.

The proposal from the State Water Board for the unimpaired flows from the Merced, Stanislaus and Tuolumne Rivers to the lower San Joaquin River (3 rivers) causes two real physical issues, water stress and then a potential unmitigated water crisis in this region. The scope of the region impacted is vast, far beyond the boundaries of the impacted irrigation districts and the respective cities that are entangled with this less than stellar proposal.

Water stress which already exists state wide and will be exasperated in the regions whose ability to obtain adequate sources of fresh water is restricted. Conjunctive water use districts such as those being supplied by the 3 tributaries mentioned become largely single source districts relying on ground water pumping, depleting aquifers at rates far faster than any type of recharge can maintain. Depleted aquifers create immediate consequences but will also alter their physical structure, negatively effecting future recharge. Immediate consequences result in the cost of new well construction, consolidation of salts, potential intrusion of salts and higher energy costs.

New well construction ranges from private domestic wells at 15 to 20 thousand dollars to municipal wells in the millions of dollars. These are the monetary impacts. The resulting water quality may be only marginally better. Higher energy costs result not just from a greater depth of pumping, but substantially from delivering pumped ground water to highly efficient, low pressure irrigation systems that commonly utilize surface water delivered by gravity. Grower power costs could minimally add 150 dollars and up per acre direct costs. Not insignificant as suggested. If any particular water treatment or crop pattern changes are necessary to alleviate poor ground water quality this economically impacts the grower. Many growers restricted to ground water have expensive remedial processes in place.

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A water crisis, defined as not acceptable for human consumption is becoming prevalent in the region. The increasing salt levels in the ground water such as nitrates have begun in some locations to exceed drinking standards for public and private use. One of the reasons for the crisis. The SWRCB own suggestions with its report issued in 2013 for Tulare and Salinas through SBX2 will be ultimately recommended for our 3 rivers region. Able to supply an alternate water source to municipalities to keep drinking water quality within acceptable standards. This alternate water supply is none other than surface water from the 3 rivers that may be diverted.

Hydropower has been a valuable commodity for the 3 river region and should be treated as such. A source of clean and renewable power which the state is desperately striving to increase to achieve goals of controlling climate change, etc., etc... Increased ground water pumping, increased power consumption, decreased hydro power, poor timing of power production results in likely increases of fossil fuels coming to the rescue.

Organic farming in the region has been steadily increasing. The number of farmers practicing organic farming increases each year and they have incorporated thousands of acres in the process. Organic farming is the environmentalist dream come true. Interestingly enough, organic farming is probably the most fragile of the farming practices. Inability to obtain quality surface water at reasonable rates will force a downturn in organic farming, diminish their highly touted sustainable practices which this state so relishes.

Throughout the region, a strong public education system has been developed. The local communities have developed primary and secondary facilities to accommodate current and future growth. Tax payers have passed bonds, attached to the land with the assumption that a prosperous future lies ahead. The state and local communities have invested in higher education in the region. Community colleges, Stanislaus State University and its satellites and more recently University of California, at Merced bring opportunity to people of the region. For these entities to serve and grow we need a prosperous economy and this economy is water based.

The impacts to the 3 rivers region have been under estimated by the preparers of the SED and perhaps even by the opponents of the proposal. Unimpaired flows of 35% during Feb. 1 to June 30 will not result in slow economic decline in the region but a rapid one and probably an irreversible one. We go through natural droughts but are always optimistic that with the natural hydrology cycle that we will return to some normal state. To create a perpetual man made drought caused by bureaucrats does not promote any sense of security.

The proposal to remove O'Shaughnessy Dam, soundly defeated by the liberal and green constituents of San Francisco is an interesting phenomena. That indicates that people still have priorities to protect their own interests first. The point is when the people of California are impacted with severe short water supplies, increased food costs and power issues the vote will not be to allow water to freely flow through the Delta to the ocean. Whose beneficial use is more important?

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