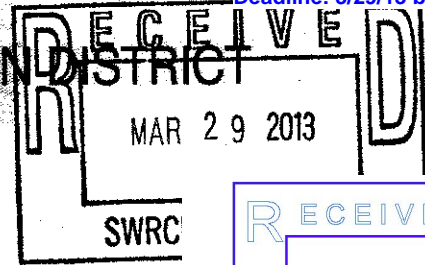




MERCED IRRIGATION DISTRICT



March 20, 2013

State Water Resources Control Board
1001 I Street
Sacramento, CA 95814-0100

ATTN: SED COMMENT LETTERS

I have to admit that when I was originally approached about considering a run for a seat on Merced Irrigation District's Board of Directors, my initial reactions were no way and why me. After all, I'm not a "big" farmer with a huge financial stake on the line in terms of water supply, nor does my career or livelihood critically depend upon the financial well being of "Big Ag". So why would I devote countless hours of my already busy life to serving as a director on the board of MID? The more I thought about it the more it became clear that I should pursue the seat. I came to that conclusion for the same reasons that I chose to run and get elected to my local school board. Very simply, to be involved in the conversations surrounding issues that are absolutely critical to our community. I personally cannot think of two bigger issues than education and water that can either help or devastate the greater Merced community.

I am Scott Koehn. I'm a lifelong resident of the Merced area, MID Division 2 Director, Trustee of McSwain Union Elementary School District, Western Regional Sales Specialist for Balchem Corporation, Owner of K-K Cattle Co., and most importantly husband to my wife of 17 years with whom we have a beautiful six year old daughter. It is that last qualification and responsibility that has me so concerned about your proposal to mandate MID and other East Side water districts release 35% of our spring time unimpaired flows down the rivers towards the ocean thus foregoing the benefit of that surface water in our communities.

I watched the public comment section of your hearing on March 20th, and attended the hearing on March 21st. It goes without saying that you are being asked to consider a tremendous amount of information on both sides of this issue. During those two days I witnessed lots of "scientific" information as well as passionate and sometimes emotional testimony about the potential impact of your decision one way or the other. Combined with the research I am doing on my own surrounding the proposal, I am left with a fairly clear observation at this point. One side, the groups that support your 35% proposal or perhaps think that amount should be even higher, seems unable to present definitive and quality data to support the hypothesis that increasing flows by some amount will achieve the intended outcome of significantly increasing the salmon population in and ultimately through the Delta. In fact a Ca. Dept. of Fish and Wildlife Fishery Program Manager is on the public record making the statement that "We won't know what kind of natural production we're going to get until we start increasing flows to see what natural production we can achieve." This admission is further supported by the fact that there is no specific flow that can be identified which consistently demonstrates benefit to the salmon population. So it seems the increased flow side of the argument is based upon at best speculative science. However on the other side, those opposed to your proposal or any amount above that, seem to have information that is in fact much more definitive. Ranging from biological peer reviewed scientific data, to economic impact studies, to specific personal circumstances it is easy to see

that the impact of your board approving and adopting the 35% unimpaired flow proposal will have absolutely devastating impacts to Central Valley communities, Bay Area communities, California's fragile economy, global consumers of California agricultural products, and most importantly countless individuals and families.

I could repeat a lot of the very important facts, figures, and negative agricultural impacts that are on the line with your decision. However, as you progress towards your decision I urge you as a fellow Californian to consider a few areas of specific impact that you may have not thought about up to now. Have you thought about the impact that having significantly less water to irrigate will have on my neighbors? They are no less than 20 families of South East Asians (Hmongs) that farm on one acre leased plots. The women work in their garden plots from literally sun up to sun down often during temperatures above 100 degrees. They grow much of the food to feed their own families as well as other crops they sell at various farmers markets throughout the valley. An adequate water supply is critical to these people making enough of a living to support their families on their own.

Have you thought about the impact that having significantly less water for irrigation will have on the employers of the overwhelming majority of Hispanic people in communities like Planada, Livingston, El Nido, Delhi, Waterford, Empire, and many others? How will these already struggling minority families provide for themselves when the water that grows the crops ultimately producing their paychecks is dramatically curtailed obviously resulting in fewer wage producing jobs?

Have you considered an area like South Merced? South Merced is comprised demographically of primarily Hispanic, South East Asian, and African Americans. Merced's current unemployment rate stands at a miserable 18.4%. However if it were broken down geographically, the number would likely be much higher in South Merced. One possible hope for Merced is trying to lure business activity there by providing more attractive electrical rates. This is dependent upon the continued investment and expansion of the MID electrical distribution system. Less water available to go through the hydro electric plant during critical spring flows would make this investment significantly less likely guaranteeing the continued economic malaise of South Merced.

Finally and closest to my heart, have you considered what all of the negative impacts add up to in terms of what Central Valley communities look like with a dramatic cut to their economic lifeblood, surface water? I have considered just that and it not only scares me but quite frankly it makes me mad as hell that there is serious consideration of a proposal that if adopted will result in no certain benefit but there is NO doubt further limitation of surface water supply would create extreme duress on my already fragile community. So please, I beg you, while you consider the speculative benefit to baby salmon also think of the certain and very negative impact you have on the communities that my baby, our now six year old daughter and her kindergarten classmates will be growing up in.

Sincerely,



Scott Koehn
MID Board of Director, Division 2