



From: Janet Neal
To: [commentletters](mailto:commentletters@waterboards.ca.gov)
Subject: Comment Letter - 2016 Bay-Delta Plan Amendment & SED
Date: Thursday, March 16, 2017 3:24:38 PM

March 16, 2017
Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor, Sacramento, CA 95814-0100
commentletters@waterboards.ca.gov

RE: Comment Letter 2016 Bay-Delta Amendment and SED

Dear Members of the State WRCB:

I am a second generation Modestan, now living near the city of Oakdale. My father was born in Modesto in 1913, and I followed 30 years later. I have read the Executive Summary of the amended SED, in which you describe the impact of taking the water that 1.25 million people in the three counties rely on as "significant but unavoidable." That's a shocking dismissal of those of us who live in this area and of the enormous investment we have made here over many decades.

The water you propose to take from us is essential to our agriculturally based economy and to our lives. In Stanislaus County, most of us have ties to the land, even if farming has not have been our primary source of income. Traditionally, people here have purchased agricultural land throughout their working years to grow crops to supplement their current income, and to provide income during retirement. My husband and I have done the same. Our tree and vine crops provide a substantial portion of our retirement income, and represent a significant investment which will be lost if the state takes our water as the SED proposes. Agricultural land in our county is worth \$25,000 -\$30,000 per acre with water, but \$ 5,000 or less per acre without water. This proposed loss of water will be devastating to us. The SED's economic analysis significantly underestimates the harm to those of us living in this region.

We all want healthy rivers and fisheries, but there's no scientific evidence that taking more of our water to release down the Stanislaus, Tuolumne, and Merced Rivers will benefit the fish. See the long term study by FishBio, reported January 2017, on the impact of pulse flows on salmon. There is scientific evidence that improving the fish habitat and reducing predation in the rivers and the Delta will improve the fisheries. Our irrigation districts have spent millions of dollars on fish research over the past decades, which the State Water Resources Board has ignored.

In a statement at the December 20, 2016, Public Hearing on the SED in Modesto, Chairwoman Marcus acknowledged that additional water alone won't be enough to improve the fisheries and the Delta. She further stated that that regulating the amount of water flow is the only tool the State Water Resources Board has to improve the situation, as if that justifies this plan. That's an outrageous conclusion. The only question seems to be how much more water the state will take. We deserve a more rigorous analysis and thoughtful proposal than this.

The SED acknowledges that taking more of our surface water will result in additional groundwater pumping. However, additional ground water pumping will not be possible under SIGMA, which mandates that ground water basins recharge their aquifers and bring the ground water usage in balance with the surface water. The SED fails to consider this conflict with SIGMA. The SED proposal to take more surface water will make it impossible to recharge our aquifers. We have flood irrigated our small almond orchard for decades with surface water from MID, which has helped recharge the aquifer. Under the SED proposal, there won't be sufficient surface water for the trees or to recharge the aquifer, in which case there won't be water to drink either. That scenario is very likely, especially with climate change, another variable the SED has omitted from its analysis. This part of the Central Valley has some of the most fertile soil in the world, and helps feed the world. We cannot let the state turn it into another Owens Valley.

The SED fails to create a viable plan for our precious water resources. I refer you to the letter of our Assembly member, Adam Gray, sent on January 3, 2017, to Board Chairwoman Felicia Marcus. Assemblyman Gray articulately sums up the glaring inadequacies of the SED document. I urge you to take his recommendation to start over, using the information provided in the public hearings and submitted to your Board, and include all stakeholders in the process in a meaningful way.

Sincerely yours,

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