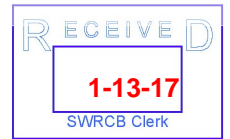


From: Peter Sugia
To: [commentletters](mailto:commentletters@modbee.com)
Cc: letters@modbee.com
Subject: 2016 Bay-Delta Plan Amendment and SED
Date: Friday, January 13, 2017 6:16:16 PM



If, as stated, the State Water Control Board must consider ALL (beneficial) uses of water (municipal, irrigation, fisheries, hydropower, recreation, etc), and that it is their responsibility to balance all these needs, accordingly when developing policies, I am concerned that the proposed dramatic increases in flow volumes on the Merced, Tuolumne, and Stanislaus Rivers may be the result of incomplete, inaccurate information and faulty logic.

Since there is no clear correlation between increased flows (natural or engineered) and larger native fish populations, it seems that it would be more prudent to direct resources toward ecosystem restoration, hatchery development, and the elimination of non-native species. Make a more thorough assessment of the effect of increased flows before advocating for that.

Sustainability is the foundation of every effective resource management plan, a component that is clearly missing here. The Water Control Board acknowledges that their plan would result in more ground water pumping, more quickly depleting this source for drinking water and irrigation. In spite of recent legislation to regulate pumping, it is unclear how long it will take to implement and enforce. In the meantime, farmers may pump until their wells go dry because they'll have considerably less surface water for their crops.

It seems likely that the economic impact to agriculture has been grossly underestimated. Without an accurate assessment of the 'ripple effect' to our general economy, the magnitude of this new policy cannot be appreciated. And if farming as we know it is no longer viable, will the proposed changes be in our best interests?

These changes appear to be neither equitable, effective, or sustainable. Increased river flows, questionably effective in supporting healthy salmon and trout populations, will create negative impacts to all other water uses, and over drafting will contribute to subsidence and depletion of the underlying aquifer. We can anticipate that the demand for water will continue to increase as a result of population growth, related agricultural demands, climate change, and the fact that water is a finite resource. Going forward, It seems likely that compromise and sacrifice will be necessary for ALL involved. It just doesn't seem like the proposed plan distributes the sacrifice evenly. Nor does it come close to developing an accurate cost benefit analysis.

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