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To: [commentletters](mailto:commentletters@comcast.net)
Cc: llmcdonough@comcast.net
Subject: Comment Letter - 2016 Bay Delta Plan Amendment and SED
Date: Friday, March 17, 2017 9:42:32 AM

To State Water Resources Control Board:

As a current landowner and stakeholder in my family's almond farming business, I ask that the State Water Resources Control Board (Board) revise its staff proposal to update minimum flow standards for the Lower San Joaquin River. Hastily developed Board proposals, without legitimate and meaningful settlement discussions with all involved parties, cannot fairly assess the impact on our state.

As I mentioned, I am a landowner and stakeholder in my family's almond farming business. My grandfather immigrated to Turlock and began farming in 1923. My father worked on the ranch as a young boy until he passed away and my mother stepped up to continue his legacy. The farm is a family business her grandchildren would like to manage one day. There have always been challenges to running a small farm -- market fluctuations, disease, labor issues, but never in the nearly one hundred years our family has been farming, has there been such a threat to its very existence. And the threat is simply a hastily written government proposal to divert 40% unimpaired flows of the Tuolumne, Stanislaus and Merced Rivers.

Is it worth it? The real impact of 40% unimpaired flows looks like:

- \$1.6 billion in economic output lost; \$167 million in farm-gate revenue lost; \$330 million in labor income lost; and 6,576 jobs lost (if SED was in effect in 2015).
- Don Pedro Reservoir will potentially be empty one out of every four years.
- In drought years (like 2015) TID farmers will receive ZERO water.
- A significant portion of farmland will be switched to non-agricultural uses.
- Groundwater will be significantly depleted.
- The quality of water in domestic wells will drop and possibly public water systems.

As farmers, we agree the pursuit of better water quality in the Delta and a healthy salmon fishery should always be an objective of the Board. However, we don't agree that increased river flows are the sole solution to fixing these needs, nor should the San Joaquin River tributaries be solely responsible for fixing these problems. Wouldn't it be prudent to consider some of the non-flow solutions such as implementing a predation suppression program on the Tuolumne; implementing river and habitat improvements on the Tuolumne; or restructuring existing river operations? Unfortunately, we know that saving the fish is not the sole motive behind such a lopsided proposal. Our water is needed for the Twin Tunnels to get off the ground. Does the sacrifice of thousands of family businesses and bankrupting the Valley's robust agriculture economy make it worthwhile for this political endeavor?

I know that my family's small almond business will cease to exist after nearly one hundred years in business if the Board's plan to divert 40% of unimpaired flows on the Tuolumne. I urge you to take a real look at the well known fallout as the SED stands

now and reconsider. Our affected community will not go quietly.

Sincerely,
Lori Soderstrom McDonough
Soderstrom Farms, Turlock, CA