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Central Valley Farmland Trust

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23 December 2016

California Water Resources Control Board

Re: Proposal for increased un-impaired flows in the San Joaquin, Stanislaus and Merced Rivers

The Central Valley Farmland Trust (CVFT) works throughout the north San Joaquin Valley (NSJV) to permanently conserve irrigated farmland on good soils to prevent them from being converted to urban or non-farm uses. We do this using State, Federal and mitigation funding.

The availability of reliable surface irrigation is a major factor contributing to the conservation value of the land. Our conservation easements specifically state that the water rights cannot be severed from the land being protected.

The significant loss of surface water in the NSJV undermines our ability to achieve our mission to protect prime farmland in California. We view our efforts as important to the State Department of Conservation's initiative to slow the conversion of good farmland to other uses.

We ask the Board to consider the above prior to making a decision on increasing un-impaired flows in the afore-mentioned rivers.



Thank you Maxwell Norton, Board Member