



Keith & Atsuko Bennett  
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Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814-0100

By e-mail: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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Comment Letter – 2016 Bay Delta Plan Amendment & SED

I was born in California and have lived in the State for the vast majority of my life. Protection of the natural environment has been important to me for as long as I can remember. It is one of the main reasons that I chose living in the San Francisco Bay Area. The Bay Delta is obviously critical to human lives around the Bay – whether simply for aesthetics, or for the benefits such as producing the food that we eat (including wild salmon). Until about 10 or 15 years ago, I remember wild salmon to be an abundant, relatively inexpensive summer treat. No more.

As a scientist, I found the research and study, including the *Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem* compelling: the unimpaired flows of during the critical spring months should be at least 60% of unimpaired flows. Whether or not one “cares” about the ecosystem, it is simply not prudent to allocate all water narrowly for human uses – doing so leaves absolutely no margin for error.

Farmers need water, but farms also have an obligation to use water wisely and not to treat water as essentially free. While we need farm products for local consumption, use of underpriced water to product export crops is simply mining by another name. There is no legitimate reason to subsidize exports of water-intensive crops such as alfalfa, or to use underpriced water to produce low-value products available elsewhere, such as cotton.

As an urban consumer of water, I have personally invested to reduce my water consumption by over 50% during the last 15 years. I obtain water from the San Francisco Public Utility Commission through the City of Palo Alto. The wholesale price of this water is roughly \$2,000 per acre foot. In contrast, the wholesale price of the same Tuolumne River water from Modesto Irrigation District is less than 1/100<sup>th</sup> the cost (\$15 / acre foot). Clearly such pricing leads to economic inefficiencies.

The current allocation practices have resulted in sub-critical flows in 19 of the last 42 years. In contrast, naturally such sub-critical flows would have occurred only once in that time period. Climate change is ushering a new era, and now is the time to improve our discipline as humans, especially with the increase of California’s population. The dooms day economic stories of disaster if water isn’t fairly

allocated are simply not true. The doomsday scenario occurs if we don't manage our water wisely, with a balanced allocation between "narrow" human uses and allocating water for the environment.

Please adopt a requirement for 60% unimpaired flows during the critical spring/ early summer months. People can and will adapt, and with only minimal pain.

Sincerely yours,

A handwritten signature in blue ink that reads "Keith & Atsuko Bennett". The signature is written in a cursive style with a large initial 'K' and 'A'.

Keith Bennett, Ph.D. and Atsuko Bennett

Cc: Marc Berman, California Assembly