

Table 4-1. Responses to Comments

Ltr#	Cmt#	Comment	Response
900	1	<p>[The City of Modesto is] concerned that the flow alternatives being proposed and considered by your Board here would take away from the water piece of our city, of our sign, which is a key piece to maintaining the vitality of our community. The SED recognizes that the flow alternatives being proposed for the Lower San Joaquin River put the City of Modesto’s water supplies at, quote, "a particular risk." My fellow City Council members and I must inform you that this is unacceptable for our risk community.</p> <p>Water is the lifeblood of this valley and the valley communities, such as the City of Modesto. Any alternative that compromises our water supplies in this manner does not reflect an appropriate weight being given to the local needs and the critically important balancing of interests here.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise a significant environmental issues. Please refer to the Service Providers section for a general response to a health and safety comments.</p> <p>For more discussion of water supply for public health and safety and the Human Right to Water, please see Master Response 2.1, Amendments to the Water Quality Control Plan, Master Response 2.7, Disadvantaged Communities, and Master Response 3.6, Service Providers.</p>
900	2	<p>In October 2005, MID and the city [of Modesto] approved a new contract which authorized an expansion of the water treatment so that MID would be able to deliver an annual average supply of up to 67,200 acre-feet of treated water to our city here. The water treatment plant involves state-of-the-art technology to ensure both reliability and water quality. And it was completed less than seven months ago, in May of 2016. It took the city more than ten years to approve, design, build the expansion of the water treatment plant because this was a substantial undertaking, backed by expensive analysis and planning. All told, the city had invested over more than \$300 million in this project. The project was expected to generate additional surface water supply of 11,200 acre feet per year by 2020.</p> <p>For obvious reasons, the alternatives the Board is now considering threaten the progress the city has made to ensure that its water supplies are reliable and sustainable, and call into question the very viability of the water treatment expansion project.</p>	<p>The commenter provided information on a water treatment plant in their service area and an agreement with MID for receiving surface water. Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues and for general information regarding the economic effects and economic analyses disclosed in the Recirculated SED (primarily Chapter 20, Economic Analyses). Please also refer to Master Response 8.4, Non-Agricultural Economic Considerations, for a discussion related to the potential impacts of implementing the plan amendments with regards to supply uncertainty and effects on water supply infrastructure planning, stranded capital assets, and water rates. Finally, please see Chapter 20, Economic Analyses, Section 20.3.3, Effects on Municipal and Industrial Water Supplies and Affected Regional Economies, M&I Water Supply Conditions in the plan area and Potential Water District and Rate Payer Effects, regarding a discussion of potential changes to rates.</p>
900	3	<p>While we [City of Modesto] all understood that surface water supplies could be reduced in times of drought, we did not anticipate that this Board would propose regulatory actions--cut surface water deliveries by 30 to 60 percent. Here in the city, we recognized the value of groundwater resources early on. We undertook costly, difficult efforts to actively manage our groundwater pumping and prevent overdraft and ensure sustainable use of our precious groundwater resources, decades, again, before the Sustainable Groundwater Management Act imposed this as a requirement. The city has been very successful in this regard.</p> <p>Surface water deliveries began in 1995. The groundwater levels in the city’s service areas have been stable. The unbalanced flow alternatives that have been proposed or our Lower San Joaquin River threaten to undo all of the city’s hard work on this important topic. The city has had the foresight to invest in innovative programs to make use of recycled water to meet regional demands.</p>	<p>The State Water Board appreciates the foresight and commitment that the City of Modesto has in managing groundwater resources in the region. The State Water Board also recognizes the negative consequences of groundwater overdraft. The need to address these negative consequences is why the legislature passed SGMA in 2014. However, the State Water Board also has a legal mandate to reasonably protect fish and wildlife beneficial uses, which it is proposing to do with the plan amendments.</p> <p>The State Water Board acknowledges that it will be challenging, but SGMA compliance cannot occur at the expense of reasonably protecting surface water beneficial uses. The plan amendments do not limit the City of Modesto’s ability to comply with SGMA; comprehensively addressing both surface water and groundwater resources allows for true integrated planning of scarce water resources that does not trade impacts between surface and groundwater and ensures long-term adequate drinking water supplies for school children and disadvantaged communities.</p> <p>The SED and plan amendments do not require or encourage groundwater substitution as a response to reductions in surface water. Rather, the SED reflects the historical local response to increase groundwater pumping when surface water availability is reduced. Actions that entities may take to replace surface water that may no longer be available due to implementation of a plan alternative are described in Chapter 16, Evaluation of Other Indirect and Additional Actions, Section 16.2, Lower San Joaquin River Alternatives—Other Indirect Actions. Substitution of surface water with groundwater is only one of the actions described in the Chapter. It will be up to the City of Modesto and other local entities to determine the precise actions that would be taken in response to implementation of the plan amendments, with or without the future condition of SGMA. For further discussion on groundwater overdraft as a legacy issue, groundwater recharge, and compliance with SGMA in the context of plan amendments, Please see Master Response 3.4, Groundwater Resources and the Sustainable Groundwater Management Act.</p>

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			<p>The proposed flow objective, 40 percent of unimpaired flow with a range from 30 to 50 percent, does not mean that surface water supplies would be cut by 30 to 50 percent. It means that 30 to 50 percent of the unimpaired flow (with a starting flow of 40 percent of unimpaired flow) would be required to stay in the river. The remaining amount of water available can be diverted for other beneficial uses. As shown in Table F.1.3-4d, Mean Annual Diversions Under 40 Percent Unimpaired Flow Proposal by Water Year Type, in Appendix F.1, Hydrologic and Water Quality Modeling, average annual reduction in water supply in the Tuolumne River under the proposed 40 percent unimpaired flow requirement ranges from zero percent (in wet years) to 38 percent (in critically dry years). For further explanation of the concept of unimpaired flow as an index of instream flow requirement, please see Master Response 1.1, General Comments. For more responses to comments on reduction in surface water supply, please Master Response 3.2, Surface Water Analyses and Modeling.</p> <p>Please see Master Response 3.6, Service Providers, for information regarding drinking water quality and a discussion on the reason why the flow objectives would not jeopardize municipal water supply.</p>
900	4	<p>The city [of Modesto] invested millions of dollars to fund construction of a tertiary treatment plant, and then entered into agreement to sell its treated wastewater to help a neighboring agricultural district, the Del Puerto Water District. This reduced reliance upon supplies that would otherwise have been diverted from the Delta. Contrary to incorrect assumption in the SED, the recycled water is no longer available as a new source for serving the future city demands. The alternatives now being considered by this Board put the city in a worse position than others because it invested in this project to help meet regional water demand with recycled water supplies. The SED effectively penalizes the City of Modesto for having been innovative in funding a recycled water program.</p>	<p>Please refer to Master Response 8.4, Non-Agricultural Economic Considerations, regarding supply uncertainty and effects on water supply infrastructure planning.</p> <p>The SED does not assume that the City of Modesto would implement a recycled water program. The plan amendments do not mandate or require any action evaluated in Chapter 16 be implemented. Chapter 16, Evaluation of Other Indirect and Additional Actions, evaluates other indirect actions and additional actions that the regulated community could take to reduce potential reservoir or water supply effects associated with implementing LSJR Alternatives 2, 3, and 4.</p>
900	5	<p>The fundamental problem with the SED’s analysis is that it simply assumes the city [of Modesto] can develop new water through substitution of groundwater, aquifer storage and recovery, which is essentially groundwater banking, or recycling to make up the losses that the flow alternatives will impose. None of these identified sources of new water is viable, nor is the city aware of any other sources that can be tapped.</p> <p>If you choose to reduce our surface water supply by 30 to 60 percent, the resulting deficit cannot simply be wished away. For example, neither groundwater pumping nor banking can make up the difference to serve the city’s needs if the cuts in the surface water supplies are as steep as have been proposed. All of the three subbasins from which the city pumps groundwater have been identified as either overdrafted or critically overdrafted. The city has taken great pains to make significant investments to ensure the current level of pumping from each basin is kept at a sustainable level. But it’s simply false to assume that this pumping could be increased without consequences.</p> <p>This is even more true with the new groundwater law taking effect than it was when the city embarked on its Conjunctive Use Program more than 30 years ago. The groundwater banking requires a source for the deposit water. If you cut our Tuolumne River supplies, we don’t have any source of water to store any groundwater bank. In addition, more stringent drinking water standards adopted by your Board also restrict the city’s ability to rely on groundwater to serve its customers. The city needs a reliable supply to support its residents, business and major industry. Surface water is needed to support the city’s needs without overdrafting the groundwater basin.</p>	<p>Please see response to Comment 900-3.</p>
900	6	<p>The city [of Modesto]’s planned growth, some of which is mandated by other laws, cannot be attained without sufficient water supplies. Yet the SED fails to analyze or identify any</p>	<p>Please see Master Response 1.1, General Comments, for a response to comments regarding mitigation measures. Please refer to the section describing mitigation measures for a discussion of municipal water</p>

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		<p>available economically viable sources of water that could make up the deficit that would result if these alternatives are imposed without modification. These impacts must be addressed, both because the laws require it and because it's the right thing to do. A government simply cannot take actions that end up leaving a whole community without adequate water supplies. It wasn't acceptable for Flint, Michigan. It shouldn't be acceptable for here either.</p> <p>We believe the City of Modesto's thoughtful approach to the integrated management of local water resources should be supported by this Board and considered a model for others throughout the state.</p>	<p>supply. Please see Master Response 3.6, Service Providers, for responses to comments regarding municipal water supply (drinking water). Please refer to sections describing availability of municipal water supply and minimum health and safety needs.</p>
900	7	<p>The city [of Modesto] has invested a significant amount of time, resources and hard work into developing a program that strikes an appropriate balance between the needs of local community its surrounding resources. The proposed flow alternatives not only fail to recognize the city's hard work, they would actually undercut it and impose deficits and hardships on our community.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.</p>
900	8	<p>We ask you, as Board Members charged with striking a fair balance among all competing interests, to take a hard look at the impacts to the city [of Modesto], which have been ignored in the analysis performed to date. We urge you to give the needs of our citizens, businesses and industry the weight and attention deserved. And we ask that you do as the city has already done and put in the hard work necessary to find a viable solution that reflects the appropriate balance of interests without sacrificing the local community's needs.</p>	<p>Please see Master Response 1.1, General Comments, and Master Response 1.2, Water Quality Control Planning Process, for information on the State Water Board's consideration of beneficial uses.</p>
900	9	<p>California is the leading producer of agriculture. And the City of Modesto is quite intrinsically connected to agriculture. It is a great industry. We're very supportive of it. And when agriculture survives here, of course our city survives or thrives, I should say. And conversely, when agriculture struggles, we struggle also as a city. In 2012 the California farms and ranches accounted for about \$42.6 billion in output, with milk production being California's largest agriculture industry. It's no surprise that dairy is the leading food in the state, and the processing of that accounting for about \$3.37 billion in value.</p> <p>Now that's statewide. I'm going to keep talking about statewide because it rounds out to sort of who and what Stanislaus County is. California grape production, also this state's second largest agricultural industry, goes into producing wine and other grape beverages, table grapes and raisins. It represents about 3.65 in direct value in 2012, \$3.5 billion, significantly, most of that right here in Stanislaus County. Rounding out the top five California food and beverage processing sectors in 2012 in terms of value added were baking, comprised of bread, bakery products, manufacturing; cookie, crackers, pasta manufacturing; tortilla manufacturing; fruits and vegetable canning, pickling, and drying; soft drink, ice manufacturing. These sectors represent about \$2.6 billion, and indirect, about \$1.75 billion in activity in the state.</p> <p>Now what that means is if you add all that employment and you come back to Stanislaus County, each and every one of those industries largely is representative of Modesto. There are about 25,000 people in Stanislaus County that are employed directly because of food processing. So when I say the city is intrinsically connected, it is because of the product being processed and provided for food right here in the bread basket of the world. Just to give you an idea, I've heard some of these names mentioned before, but some of the major processors that we provide water to is Foster Farms. Stanislaus Foods, one of our largest</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that make a general comment regarding the plan amendments and general information regarding the economic analysis. Also, please see Master Response 8.2, Regional Agricultural Economic Effects, for discussion of the potential effects on food processors.</p>

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		<p>water users. Yosemite Meats, Olen Properties, 7Up Company, EJ Gallo Winery, Seneca Foods, SunOptica (sic), Del Monte, Rizo Lopez, Frito-Lay, Nestle, Gallo Spirits, Gallo Glass, Americold, and Pacific Southwest Containers and Harris Moran Seed, all of those major users right here and all of them very much in need of a reliable water supply.</p>	
900	10	<p>When we've seen the SED, it is a big of a concern. Because the SED, this is important, the SED does not acknowledge urban uses of water as important beneficial use under current state law. That's serious. The alternatives put forth in the SED do not offer a balance that appropriately reflects the needs of the people in this city and in our county. That's significant.</p>	<p>Please see Master Response 1.1, General Comments, regarding the consideration of beneficial uses. Please see the following sections in Chapter 13, Service Providers, which acknowledge that water for domestic purposes is the highest use: Section 13.3.2, State California Code of Regulations, Title 23, and California Water Code Section 106; Section 13.4.3 Impacts and Mitigation Measures Impact SP-1.</p>
900	11	<p>Modesto has planned extensively to ensure reliable water supplies for not only its citizens, but also for the many manufacturing industries. And we completed a \$200 million plan, just completed last year. Half the plan we had to scuttle because of water conservation measures. And we planned it more than a decade-and-a-half ago when there was no way to understand or project what was going to happen. Now, no one can project a drought, but it was significant.</p> <p>We also created our Recycled Water Project. And one of the challenges was could we get that Recycled Water Project finished before 2017. That project is underway, ahead of schedule. Not only will we finish by 2017, we figured Christmas Day of 2017, it will be finished somewhere, we're hoping ahead of schedule between September and October of 2017. Thank you for helping us get that done. It is a significant use of water.</p> <p>As the Mayor [of Modesto] said, up to 35,000 acre, maybe 40,000, depending on the growth of Modesto and Turlock and some of the other cities that join in with us, of recycled water going back into agriculture. And it's the perfect partnership between the city and agriculture and giving back. It's just a great opportunity.</p> <p>The economic mandate of state-mandated drought restrictions and the significant reductions in water usage has really affected our rates, because we designed this \$200 million plan and now we have to--we can't use the water and process it and reduce the water. Just last year, we had a 25 percent rate hike for all of the citizens in Modesto. That's pretty significant for a lot of people. And if we have more restrictions, we'll have this enormous plant that we'll have to raise rates on a plant that we can't even operate. So I would ask that it is considered, the impact on cities of municipal waters.</p>	<p>Please see response to comment 900-2 regarding information on rates and water supply infrastructure.</p>
900	12	<p>This is a map of our aquifer. And you can see, the only one in compliance is Stanislaus County. This didn't happen by accident. If we have to enforce this, we're going to be in problems.</p>	<p>Please see response to Comment 900-3.</p>
900	13	<p>The problem for salmon can be solved. And we have cities that take the water out of the Delta, a list of about 200 cities, and that's where the problem lies.</p>	<p>The commenter states that exports from the Delta are problematic for salmon. This comment does not make a general comment regarding the plan amendments or raise significant environmental issues. As such, no further response is required.</p>
900	14	<p>We in Modesto urge you to find another way. Because these faces of these families, these are the ones that are here to fight for our future, fight for our waters, fight for our farms. Because this is not just about local economy, but this about all of us. And more than anything I just want to finish up real quick by saying that you've heard our motto, you know, "Water, Wealth, Contentment, Health." If you take away our water, you will destroy our</p>	<p>Please see Master Response 1.1, General Comments, for a response to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please refer to the Service Providers section for a general response to a health and safety comments. Please see Master Response 8.1, Local Agricultural Economic Effects and the SWAP Model, for a discussion of economic impacts.</p>

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		wealth, our contentment and our health. Please think of another way.	
900	15	As many of the towns in the valley have trouble with different constituents, nitrates is obviously a problem that's accumulated over time, arsenic, uranium, things like that. Here in Modesto, primarily we've had to shut down wells previously because of uranium. We have wellhead treatment, expensive wellhead treatment that we've had to add for many of our wells for DBCP, PCE.	<p>The State Water Board is aware of the issues with groundwater quality that some communities in the plan area are experiencing and information regarding the legacy groundwater quality issue related to different constituents of concern is included in Chapter 9, Groundwater Resources, Chapter 13, Service Providers, and Chapter 22, Integrated Discussion of Potential Municipal and Domestic Water Supply Management Options.</p> <p>As described in Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act, legacy groundwater quality issues would be addressed in the groundwater sustainability plans prepared by local agencies as required by the Sustainable Groundwater Management Act.</p> <p>Please refer to Master Response 2.1, Amendments to the Water Quality Control Plan, for a discussion on protection of water supply for minimum health and safety needs as identified by the program of implementation. Please refer to Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.</p>
900	16	<p>What [the City of Modesto is] most concerned with is the upcoming regulations that the State Water Board is about to implement next year, which is for 1,2,3-trichloropropane, and that's at a standard of five parts per trillion. And we've gone through and evaluated our wells. And we have 16 wells currently that will require wellhead treatment or will have to be taken out of service because of the new MCL for trichloropropane. The problem with that is, at the same time, obviously, when you're talking about reducing our surface water and require more groundwater pumping, now it's going to require millions of dollars of investment in wellhead treatment, if we can get it done quickly enough, and/or the elimination of that water source.</p> <p>So as the SED addresses the fact that we have to look for new water sources, on the other hand, you're asking us, basically, to abandon an existing water source going forward for the new standard. That's the real constituent of concern right now. We know there's more coming down the line over time as more health effects studies are done. So that's our real problem right now.</p>	<p>Commenter is referring to a regulation pertaining to newly adopted maximum contaminant level (MCL) (primary drinking water standard) for 1,2,3- trichloropropane. This standard is unrelated to the plan amendments proposed by the State Water Board for the Water Quality Control Plan Update.</p> <p>Please refer to Master Response 3.6, Service Providers, regarding availability of municipal water supplies, compliance with SGMA and the plan amendments, and local resiliency and drinking water quality</p>
900	17	<p>The people here in the area, the county, and Modesto specifically, have taken it upon themselves to preserve this precious resource, not so that it can be diverted somewhere else, but so that it can be managed here locally in conjunction with our integrated water management.</p> <p>We haven't thought too far ahead about making further reductions at this point in time. It's pretty obvious that outdoor irrigation is where the bang for the buck is. We've had people, obviously, that potentially have lost property values because of the lack of watering. We're going forward. We've told everybody, we don't ever expect to go beyond two-day-a-week watering in the summertime. This is an arid, hot area in the summertime. They're using beneficial use of their landscaping, their lawns, et cetera. So the people have sacrificed greatly. Before we'd go forward and determine what other steps may be necessary, which we hope never would have to happen, we'd have to solicit a lot of public input to get to that situation.</p> <p>The people have done a great job. In fact, I'll go so far as to say the indoor conservation is fantastic. We're concerned about meeting our full water needs for all of our recycled water projects, because we currently also have a ranch that we irrigate because the flows have</p>	<p>The State Water Board acknowledges the City Modesto's water conservation effort and ongoing commitment to demand management.</p> <p>Compliance with the LSJR flow objectives will not require service providers to conserve more water than they have already. Please refer to Master Response 3.6, Service Providers, regarding past water conservation efforts during the recent drought</p>

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		dropped so substantially from indoor water use into our wastewater facilities. We're not even sure our water balance is going to meet our existing dates for recycled water. So it's hard to imagine that we can cut back much further.	
900	18	I wanted to acknowledge local parent advocate Debbie Barrera, who just today mentioned to me that at the school in Turlock for her child, Roselawn School, I think it's Roselawn Junior High School, she mentioned to me that apparently the lead contamination in the water is so high that they won't even let the kids drink the water or wash their hands or do stuff like that with it, as well.	Please see response to Comment 900-15.
900	19	If there is language talking about important beneficial use that would be helpful to know that.	Please refer to the SED Executive Summary; Chapter 1, Introduction, and Chapter 3, Alternatives Description where beneficial uses are discussed in the context of the 2006 Bay-Delta Plan. Please refer to Consideration of Beneficial Use in Master Response 1.1, and Consideration of Beneficial Uses in Master Response 1.2 Water Quality Control Plan Process.
900	20	We [City of Modesto] had previously engaged in water reductions of more than 20 percent long before the state was asking for it. So we were disadvantaged already 20 percent when we were then asked for an additional 36 percent.	The State Water Board acknowledges the City Modesto's water conservation effort and ongoing commitment to demand management. The comment does not raise significant environmental issues or make a general comment regarding the plan amendments. As such, no further response is required.
900	21	The real impact...is the financial burden to our ratepayers. We have a stranded asset now in this expensive water plant that we can't use. We increased the water rates 25 percent this year, and we based that on a permanent 25 percent reduction forever going forward. But any further reductions are going to continue to put price pressure on the water, and it's going to well exceed the affordable level defined by the State Water Resources Control Board for water. So that's a real problem for our ratepayers.	Please see response for comment letter 900-2 regarding information on rates and water supply infrastructure.
901	1	We're all here to share this overpromised and overextended resource, which is the water in our state. And it's us, it's the people and the farmers and the fish and the other little animals and the birds. As was discussed earlier, you know, with the current population of 39 million, and somebody today thinks that we're heading towards 50 in California, we really need to figure out a way to cooperate with each other on all fronts, or we truly will be heading for a water wars it seems to me. So, thank you. You know, this is a strategic and a truly long-term solution that we're looking for and thank you for being willing to sort of hang in there and look to the future because it's just critical for all of us. You know, we're in this together, all of us.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
901	2	Bill Maher has left, but I also would second his idea of maybe having some hearings in the Bay Area, where the Bay Area people, the San Francisco and the BAWSCA people who drink Tuolumne water and are certainly affected by the quality of the Bay and recreate on the river. So, I would encourage you if you have the time and can fit it into your schedule, that would be a different perspective that you've been getting from all the hearings you've been doing down here in the Valley.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
902	1	I'm going to talk about an economic impact that your staff may not have considered. That is, if the drinking water supply, residential use water supply out here in the Central Valley collapses, you won't have thousands and thousands of people going over the Altamont Pass to jobs in the Bay Area because they won't want to live out here. And the ones with jobs in the Bay Area have enough money to vote with their feet like happened in Calaveras County, as was recounted earlier today.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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902	2	There's an additional economic impact that's not been talked about. I will talk about a different impact, on which I've gained some insight from my years as Secretary/Treasurer in the State California Beekeepers Association. I am not speaking for the Association; this is my observation. It's been said that about a third of the food that we eat is pollinated by bees. About two-thirds of your standard commercial beekeeper's income comes from pollinating almonds. If the almond industry is severely impacted, so will be the commercial beekeeper industry and, therefore, so will the pollination of all those other crops. Bottom line, your food prices are going to go up. And even if you're able to get -- and that presumes that you'll even be able to get food from around here. A lot of it will have to be imported from places that don't have the FDA looking over their shoulder.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
903	1	We, in Stanislaus County, are very concerned, obviously, and we know that the SED has the potential to completely decimate our ag economies here. And therefore, it's extremely critical that we do have the opportunity to be here and to be heard. Although I appreciate the 60-day extension of the original 60-day comment period, I don't believe it is adequate for stakeholders to thoroughly review and respond to a complex 4,000-page document that was put together over four years, suggesting a significant reallocation of water from the three rivers that will have dire impacts on the three-county area and beyond.	Please see Master Response 1.1, General Comments, regarding the public outreach process. Note that the public comment period was extended for a total duration of 6 months.
903	2	Studies and estimates by local economists and water and ag agencies clearly suggest that the assumptions in the SED in regard to the impacts on the local economy, groundwater, drinking water and ag production are greatly underestimated. Most experts indicate that the potential for increase in the salmon population may be very minimal and is very speculative. And, in fact, I did see one analysis which spoke to the fact that it may provide an additional 1,100 salmon, 1,100, at the expense of our ag economy here.	<p>The purpose of the environmental review process is to disclose potential environmental impacts to the public and decision-makers. The State Water Board is not required to include a cost-benefit analysis, as the commenter seems to suggest. Please see Master Response 1.2, Water Quality Control Planning Process, regarding consideration of beneficial uses by the State Water Board. Please see Master Response 1.1, General Comments, regarding general responses to economic-related comments, including those attempting to compare costs and benefits.</p> <p>The SED identifies and discloses potential economic effects (Chapter 11, Agricultural Resources; Chapter 20, Economic Analyses; Chapter 22, Integrated Discussion of Potential Municipal and Domestic Water Supply Management Options; and Appendix G, Agricultural Economic Effects of the Lower San Joaquin River Flow Alternatives: Methodology and Modeling Results). For additional information regarding economic effects please refer Master Response 8.0, Economic Analyses Framework and Assessment Tools; Master Response 8.1, Local Agricultural Economic Effects and the SWAP Model; Master Response 8.2, Regional Agricultural Economic Effects; Master Response 8.4, Non-Agricultural Economic Considerations; and Master Response 8.5, Assessment of Potential Effects on the San Francisco Bay Area Regional Water System.</p> <p>The State Water Board acknowledges that uncertainty is inherent in any programmatic planning effort of this geographic and temporal scale. Moreover, foreseeing the unforeseeable is not possible. The State Water Board strived to use best available science throughout the impacts analysis in accordance with State CEQA Guidelines. As described in the SED Appendix C, Technical Report on the Scientific Basis for Alternative San Joaquin River Flow and Southern Delta Salinity Objectives, and Chapter 19, Analyses of Benefits to Native Fish Populations from Increased Flow between February 1 and June 30, scientific evidence demonstrates that increased and more variable flow is the foundation for survival for fish. For further discussion, please refer to Master Response 3.1, Fish Protection, regarding SalSim.</p>
903	3	The SED acknowledges that the region would have to make up the loss of surface water by increased pumping of groundwater. This directly contradicts the goals of the Sustainable Groundwater Management Act process by reducing irrigation water, which is the large recharge factor in this area, which already has some significantly overdrafted basins. The SED suggests no forms of mitigation for these economic and groundwater impacts, but merely states that the impact will be significant but unavoidable. This is a less than	Please see Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act, for a discussion on potential increases in groundwater pumping, SED consideration of SGMA, and groundwater recharge. The SED does not contradict SGMA, because SGMA requires local public agencies sustainably manage groundwater basins that are subject to SGMA without causing "undesirable results" (Water Code § 10721(x)). The SED and plan amendments do not require or encourage increased groundwater pumping. The SED analyses reflect that the historical local response to reduced surface water availability has been to

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		<p>acceptable response to these three counties which have not yet recovered from the economic downturn, and the mortgage crisis, and the drought that we have suffered since 2009.</p>	<p>choose to increase groundwater pumping; therefore, the SED was required to analyze this reasonably foreseeable and its impact on the groundwater basin from this local response.</p> <p>For discussions on potential economic impacts, please see Master Responses 8.1, Local Agricultural Economic Effects and the SWAP Model; and 8.2, Regional Agricultural Economic Effects.</p>
903	4	<p>I have proposed for years that California needs a comprehensive and consistent approach to water planning, taking into account all projects and development and all proposed projects, large and small. A plan that does not take into account 165 years of alterations to the Delta and the rivers that feed it, as well as the introduction of invasive species and subsequent predation seems unlikely to succeed on its own without the expertise and assistance of our local water agencies.</p> <p>The Water Board staff presentations to the Merced, Stanislaus and San Joaquin Boards of Supervisors included a suggestion that the best approach would be to work with our water agencies to achieve the desired goals, rather than spend years and monetary resources in litigation. I respectfully request that the Board concentrate its efforts in this direction.</p>	<p>Please see Master Response 1.1, General Comments, for information regarding voluntary agreements, collaboration with agencies, and the relationship to other plans and programs in the state. Please refer to Master Response 2.5, Baseline and NO Project for discussion regarding the no project conditions. Please also refer to the environmental setting section for each of the resource area chapters. In these sections, it is clear that the plan amendments and SED does consider current conditions; not historic conditions as the commenter mentions.</p>
904	1	<p>I'm not an expert in in-channel streambed improvements or riparian floodplain, but some of the things that I think we could look at and that I'm familiar with in my experience in the last three years on the river, in addition to blight are things like the issue with invasive species. We have water hyacinth problems on our river, on the Tuolumne, anywhere from 10 to 15 significant blockages over the past couple of years. Myself and a few other volunteers have worked on clearing all of those blockages, and we currently have a river that's open to navigation, has a natural habitat. But when those blockages show up, they really alter the system and it doesn't work the way it's supposed to.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
904	2	<p>We should rid of Dennett Dam. It serves no purpose. It's a killer. It does not belong. It should have been removed a long time ago.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
904	3	<p>Our river is not open to recreation to the public very well. And I think that public access to the river is a big help in keeping it clean for volunteer groups. We currently have one river access point in all of Modesto, and that's in the Allegiant Park area where there isn't even a functioning boat ramp, restroom, or safe parking. There are only two other places on the entire river where you have parking, a restroom, and a boat launch to access it, and they're each 20 and 40 minutes east of town, at Fox Grove and up at Basso Bridge.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
904	4	<p>We'd like to see an improved access to our river. We would like to help keep it clean. We have volunteers who care very much about it. And these are not flow issues. These are non-flow issues that we can work with people on. And I encourage you to encourage the districts and the municipalities to do everything they can in those respects to try to save on flow and try to get the river in a state that people can be proud of.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
905	1	<p>Currently the cities of Ceres and Turlock are entirely dependent upon groundwater for our drinking water supply. Through the years, our cities have struggled to keep up with ever-changing state-mandated water quality standards. We have seen numerous wells taken out of production and can no longer be used. In 2013, the City of Ceres worked with Stanislaus County and the state to provide potable water to a remote disadvantaged community known as the Monterey Park Tract. In the Monterey Park Tract there were nearly 200</p>	<p>The State Water Board recognizes the challenges the Cities face in providing safe drinking water, and appreciates the efforts that the Cities have undertaken to supply safe and reliable municipal drinking water to citizens.</p> <p>For a discussion regarding the plan amendments as they relate to DACs and the resources available to assist DACs in dealing with water supply issues and improve water supply resiliency, please see Master Response</p>

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		<p>citizens that were drinking water that exceeded state and federal standards for arsenic and nitrates. It was not a good situation, and it was one that was a significant health and safety issue.</p> <p>Thus, we understand firsthand the hardships families can suffer when their drinking water is inadequate or contaminated. And we have done our part to help disadvantaged communities in need, but treating groundwater no longer is a long-term solution. We must augment our groundwater supplies with a surface water solution that allows for blending. That is why the SRWA [Stanislaus Regional Water Authority] was created and is moving toward the ultimate construction of a multi-million dollar water treatment facility that is desperately needed. However, what you are proposing by your actions severely jeopardizes our project.</p>	<p>2.7, Disadvantaged Communities.</p> <p>Please see Master Response 3.6, Service Providers, for information regarding drinking water quality.</p> <p>Please see Master Response 3.4, Groundwater Resources and the Sustainable Groundwater Management Act, for a discussion on groundwater recharge and the plan amendment.</p> <p>Please see Master Response 8.4, Non-Agricultural Economic Considerations, for a discussion on the reason why the LSJR flow objectives would not jeopardize investment on existing or planned water infrastructure.</p>
905	2	<p>We often hear at the state level that this is a water-rich region that needs to conserve more. I'd like to point out that our City has been committed to water conservation and has far surpassed the state conservation goals. We are doing our part to conserve.</p>	<p>The State Water Board acknowledges the commenter's water conservation effort and ongoing commitment to demand management. However, this comment does not raise significant environmental issues or make a general comment regarding the plan amendments. As such, no further response is required.</p>
905	3	<p>We are very sensitive to the fact that we are entirely dependent upon the Turlock Subbasin for our water supply, and our groundwater in our region is a diminishing resource. One average rain year will not recharge the aquifer. So alternative solutions, like the proposed surface water plant, must be developed. Not only will the SRWA [Stanislaus Regional Water Authority] project provide an alternative source of quality drinking water, but it will also assist our region to comply with the Sustainable Groundwater Management Act of 2014.</p>	<p>The commenter is acknowledging their dependence on the Turlock groundwater subbasin for their water supply, and that groundwater in the region is limited (Turlock subbasin is a high priority groundwater subbasin). The commenter states that the Stanislaus Regional Water Authority "project" (presumably referring to the Regional Surface Water Supply Project) will provide an alternative source of drinking water, which will help the region comply with SGMA. This comment does not raise significant environmental issues or make a general comment regarding the plan amendments. As such, no further response is required.</p>
905	4	<p>I urge you to listen to the comments being made today and the impacts that your proposed flows will have on our communities. It's not as easy to say, go ahead and punch more wells for groundwater, because we've been trying that and it doesn't work. Selfishly speaking, your proposed flows will be devastating to our community's drinking water supplies. And I urge you to modify the report accordingly.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.</p>
906	1	<p>I'd like you to understand the implications of the proposed increased flows. Increased flows are not going to fix your salmon issues, as we've heard. You're dealing with an ecosystem that is overrun with non-native species that are voracious predators. So, until you fix your food web problems, allowing more water to flow down those rivers isn't going to make much of a difference.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
906	2	<p>If you're looking at a species of fish that is at the southernmost end of its range, of its historical range. Given historical natural climate changes, you would probably find that salmon in this area have likely gone in and out of extinction several times without the aid of man. With current climate change, we have all played a part in, all of us, these fish do not have a chance at this latitude until that is reversed. And if you think you need June flows, you don't. I've worked on this river. I know what it's like in June. You're just beating a dead horse, or, in this case, a dead fish.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
906	3	<p>We can talk about fish more or we can talk about one other species that is impacted. I'm talking about the human impact. In this argument, the human component has been trivialized to the point of absurdity. The residents of the Central Valley are treated like second-class citizens, like we don't matter. And I'm here to tell you that we do matter, and remind you that we are living, breathing human beings with the same rights as people in Southern California and in the Bay Area. I'm asking you to not only open your ears but open</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>your minds and apply logic, common sense, and honesty about what you're really after here.</p>	
906	4	<p>We don't often say a lot, but I have a lot of political clout because we're busy growing the food on your plate. You have to understand that the stars are aligned here in California. We have been blessed with the most fertile soil on the planet, a near perfect climate that enables us to produce food year-round, political and economic stability, an infrastructure that allows for the storage and movement of water, and regulation that ensures food safety. If farming is to take place anywhere on this planet, it should take place here because of our ability to produce so much variety and volume per unit of water.</p> <p>And, contrary what a distorted media presents, Californians are very efficient users of water. We live to produce the most with the least amount of water in order to remain solvent. If you take this water away from us, you take away our ability to remain solvent. No water means no farming which means no food. So where are you going to get your fresh, safe, local produce then? And if it comes to that, you might as well make another endangered species poster, one for the California farmer.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
907	1	<p>The City of Turlock is concerned with the declining salmon population. However, we are concerned a little bit with the approach that the SED proposes. And I'd like to thank you. The previous version of the SED really didn't concern itself by the impacts of unimpaired flows on urban and municipal water supply. You've done a much better job this go around in looking at those impacts, and I appreciate that.</p> <p>We recognize, like many others--and the PPIC had a good paper out recently, there are issues with the salmon population, but we're willing to focus on more issues than just flow, take a more comprehensive and balanced approach to declining salmon populations, look at it more on an ecosystem-wide basis. We recognize that you have limited tools at your disposal. Water rights is probably your most powerful tool. So, you're a little bit stymied in what you can do.</p> <p>But my concern is water rights is a very blunt instrument that you have for your goals and objectives here. To me, it's like you're trying to do a delicate surgery using a pair of kitchen scissors, and you're sure to have an impact, but the results may not be effective or desirable. And as a version of the Hippocratic Oath, it starts with, "First do no harm." And we're concerned that, although your goals are laudable, you may be doing more harm without achieving your stated objectives.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please refer to sections describing non-flow measures and the section acknowledging the concerns of community members.</p>
907	2	<p>Our [City of Turlock's] economy is mainly agricultural based. Our many employers are food processors, including Foster Farms, Sunnyside Farms, Blue Diamond Growers, Land O'Lakes and many, many others. And all these people rely on--dependent--all these people are dependent upon a safe and reliable water supply for their existence. And we're entirely dependent on groundwater for our drinking water supply right now. And we have 19 active wells.</p> <p>But we continue to lose wells through contamination and declining water levels. And we've also helped out on our region supplying emergency water supplies to the county through a program they have with--I can't think of it--it's Self-Help Enterprises. And we've also done some emergency tie-ins to neighbors who have lost their wells.</p> <p>So, we take the health of the salmon fishing very seriously. Since 1922, we have discharged</p>	<p>The State Water Board recognizes the challenges facing the City of Turlock in providing a safe and reliable water supply, and appreciates the efforts the City has undertaken to supply emergency drinking water to citizens, improve the quality of wastewater effluent, increase recycled water use, and conserve water.</p> <p>The existing groundwater overdraft conditions noted in the comment are legacy issues caused by unsustainable agricultural expansion; SGMA was passed by the legislature in 2014 to address overdraft issues. Under SGMA, GSAs will define what sustainability means at the local level based on the beneficial uses and users of groundwater in each basin.</p> <p>Actions that affected entities could take to develop alternative water supplies, if implementation of plan amendments results in a reduction of surface water, are described in Chapter 16, Evaluation of Other Indirect and Additional Actions, Section 16.2, Lower San Joaquin River Alternatives—Other Indirect Actions. Water Conservation is only one of the actions described in the Chapter. It will be up to local entities to</p>

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		<p>our treated wastewater into the San Joaquin River. And, over the years, we've made significant investments, almost \$60,000,000 in the past ten years, to improve the quality of our wastewater effluent. And right now, we're in the final throes of designing our recycled water conveyance pipe plan.</p> <p>So, we hope to that under construction towards the end of next year and join in with the City of Modesto and Del Puerto Water District. So, that's been a great project. And we're also working on getting some recycled water to TID to put in their canal system. So, if we could just get some help from your regional board, we would appreciate it. And we understand our responsibility to conserve water. Last year, we pumped about 5.6 billion gallons. So, for my ag friends, that's about 17,000 acre-feet, which is about the same amount of water we pumped in 1994.</p> <p>We've pumped 17,000 acre-feet last year, the same amount that we did in 1994. So, in 21 years, we're pumping the same amount of water even though our population has grown by 24,000 people in that time. So, that's a reduction of per-capita reduction by 34 percent. And we will succeed in the requirements under SB X7-7. We've exceeded the conservation requirements in our Urban Water Management Plan. And there's 33 of us out of 379 who still have conservation orders under your amended emergency regulation. And we adopted a higher standard than we needed to, we went to 20 percent instead of 16 percent, recognizing the issues that we're having with our aquifer.</p> <p>But despite all that conservation, our aquifer continues to decline. It's at a record low level. So, one of the concerns that we have is the SED really focuses on conservation as if that's a solution. And we've shown that we can conserve as much as we can but it has no impact whatsoever on our aquifer conditions, at least under the City of Turlock.</p>	<p>determine the precise actions that would be taken in response to implementation of the plan amendments, with or without the future condition of SGMA.</p> <p>For further discussion on groundwater overdraft as a legacy issue and compliance with SGMA in the context of plan amendments, Please see Master Response 3.4, Groundwater Resources and the Sustainable Groundwater Management Act.</p> <p>Please see Master Response 3.6, Service Provides, for discussion related to providing water for a variety of uses in the plan area.</p>
907	3	<p>We [City of Turlock] really need to expand our portfolio of water resources as a community. Our groundwater is a diminishing resource. And, as you saw earlier, the Turlock and Modesto subbasins are the only two subbasins in the San Joaquin Valley that are not critically overdrafted, and there's no coincidence to that. The surface water supplies from the TID and MID are our largest source of recharge and helps recharge our aquifer.</p> <p>But, despite that recharge, we're looking at various options to develop a service water supply, and we've worked with Ceres to form the Stanislaus Regional Water Authority, and TID to get about 30,000 acre-feet from TID; 20,000 for Turlock, 10,000 for Ceres, which is the maximum build out. It'll start with the smaller amount. And, also, that's been kind of our means of complying with SGMA. So in-lieu recharge, less groundwater pumping. We thought we had the perfect solution. And, then, in our recent conversations with Turlock Irrigation District, their preliminary estimates show that they'll have very limited water supply to provide us.</p> <p>So, it looks at this point that we won't be able to make that \$150,000,000 investment if we don't have a stable supply to--a stable raw water supply. So, it's really kind of put our project in this tailspin at this time. And, so, we're concerned with the flow requirements in the SED will further exacerbate our drinking water supply and drinking water quality problems and take away our ability to comply with SGMA.</p>	<p>Please refer to Master Response 3.6, Service Providers, regarding availability of municipal water supplies, compliance with SGMA and the plan amendments, local resiliency and drinking water quality, and the potential impacts of the plan amendments on service providers' ability to provide safe and reliable water.</p> <p>In Chapter 13, Service Providers, it is acknowledged that the potential impacts due to surface water reductions are considered within the general context of water supply agreements and contracts in Impact SP-1. Please refer to Master Response 3.6, Service Providers, regarding the availability of municipal water supply, and see Master Response 8.4, Non-Agricultural Economic Considerations, regarding the economics of the availability of municipal water supplies.</p> <p>Chapter 20, Economics, addresses potential economic effects of reduced surface water diversions on affected water districts and ratepayers within the plan area. South San Joaquin Irrigation District, Stockton East Water District, and Modesto Irrigation District were provided as examples (for the purpose of determining potential economic effects) of service providers in the plan area because they exhibit certain characteristics important to assessing potential economic effects because, among other things, they have agreements to either provide surface water to other water users or receive surface water. Further, Master Response 8.4 discusses water supply infrastructure planning.</p>
907	4	<p>The document [SED] notes that there will be a significant reduction in supply and a significant reduction in groundwater quality. And that's a big concern for me. It notes certain communities like Hilmar, Keyes, and Hughson, and the community of Hickman, may</p>	<p>As described in Chapter 9, Groundwater Resources, a change in groundwater pumping can indirectly influence groundwater quality, as would be the case under LSJR Alternative 2 with adaptive implementation method 1 in the Extended Merced Subbasin; and under LSJR Alternatives 3 and 4 in the Modesto, Turlock,</p>

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		<p>have significant water supply issues. And Hickman's important because my wife grew up there, so that is a concern for me.</p> <p>So, the SED says, well, you know, you have these impacts, there is two ways out of it. You can reduce groundwater degradation through compliance with SGMA, or you can build a number of infrastructure projects. Okay. That's fine. It talks about sale and transfer of surface water, recycle water supplies, new surface water supplies, but all these things are very expensive and we're talking about millions and millions of dollars to make those investments in that infrastructure to offset the impacts of the flow proposals in the SED.</p> <p>And the document doesn't consider the financial feasibility, the regulatory feasibility, the political feasibility of doing those projects. And, so, I'm concerned that...this part of the San Joaquin Valley will lack access to an adequate supply of safe drinking water.</p>	<p>Extended Merced Subbasins, and Eastern San Joaquin subbasin (LSJR Alternative 4 only).</p> <p>Please refer to Master Response 3.6, Service Providers, regarding water for minimum health and safety needs.</p> <p>Please see Master Response 2.1, Amendments to the Water Quality Control Plan, regarding water available for public health and safety as identified by the program of implementation.</p> <p>Please see Master Response 2.7, Disadvantaged Communities, regarding drinking water quality, technical and financial assistance programs for small water systems and disadvantaged communities, and SGMA's role in the protection of disadvantaged communities.</p> <p>The plan amendments do not mandate or require any action evaluated in Chapter 16 be implemented. Chapter 16, Evaluation of Other Indirect and Additional Actions, evaluates other indirect actions and additional actions that the regulated community could take to reduce potential reservoir or water supply effects associated with implementing LSJR Alternatives 2, 3, and 4, and these include the actions identified by the commenter. These actions and other actions were included because other documents indicated they had previously been under consideration by various entities and are thus considered reasonably foreseeable. Although agencies may elect not to pursue certain methods of compliance under particular circumstances, it is reasonable to include them in a portfolio of possible actions because they were considered in the past and may be appropriate for further consideration depending on how circumstances change. Furthermore, if these actions do not occur, the potential environmental impacts and estimated costs associated with these actions, as disclosed in Chapter 16, would not occur.</p>
907	5	<p>One of the things that frustrates me as a former CEQA practitioner is that all of the impacts, the state says, well, we can't mitigate those because we don't have control over that. So, if there's a new surface water supply needed, well, we don't build surface water plants, so somebody else needs to figure that out. And I feel like you're really not taking care of your responsibilities under CEQA as the lead agency.</p> <p>The Board of Trustees of the California State University System went through this a few years ago with CSU Monterey Bay. Where they said, hey, our traffic impacts off campus are not our problem, that's the city's problem. And the California Supreme Court said, no, if you know you're having an impact, even if it's off your campus, you need to mitigate it. And that was recently upheld again in San Diego as San Diego State was looking to expand.</p> <p>So, I really encourage you to look at--it's called the Marina dictum. Your CEQA attorneys will know it better than me. But I think there's obligation for the state to look at providing--for the State Water Board to offset some of these impacts to the environment through this project.</p>	<p>Please see Master Response 1.1., General Comments, regarding mitigation measures that are incorporated into the SED. The State Water Board has incorporated and evaluated mitigation to reduce significant impacts throughout the SED. For example, in Chapters 9, Groundwater Resources and Chapter 11, Agricultural Resources the State Water Board incorporated mitigation measures that could possible reduce the impacts identified. However, unlike the cases cited by the commenter (need full citations), there is no existing program or agency that has the responsibility to undertake the mitigation. In the case of groundwater, SGMA could be the program that would mitigate groundwater impacts and the State Water Board does have authority under SGMA and SGMA's statutory obligations will ensure the State Water Board will not approve any GSP that does not include and implement actions that will reduce groundwater overdraft. However, the SGMA deadlines for state intervention are still prospective; therefore, State Water Board mitigation to protect the groundwater basin from the indirect impacts of the plan amendments is infeasible at this time separate and beyond actions required by SGMA, but mitigation under local authorities is both feasible and required by SGMA as discussed in Chapter 9, Groundwater Resources. As such, the State Water Board appropriately determined that impacts would be significant and unavoidable in Chapters 9 and 11 with respect to groundwater resources and agricultural resources.</p>
907	6	<p>I'm really concerned that the crisis we've seen the last few years in East Porterville could be replicated on a larger scale in our region. And I don't say that lightly and I don't mean to be an alarmist. And I think the issue in Flint, Michigan, has really pushed East Porterville off the front-page news, but there's a significant problem down there and it's being addressed, but it's taken three years to get there. And that's a big concern for me. And, if you've had no running water when you go tent camping or your water supply goes out, you know how miserable it can be to be without running water. And that could affect a large part of this part of the Valley right here.</p> <p>And, as a kid, why I have a degree in geography, so I always used to watch geography</p>	<p>Please refer to Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act regarding current groundwater overdraft and agricultural water use and expansion.</p> <p>Please refer to Master Response 2.7, Disadvantaged Communities, regarding SGMA's role in the protection of disadvantaged communities, and consideration of human right to water.</p> <p>Please refer to Master Response 3.6, Service Providers, regarding water for minimum health and safety needs, and municipal water use vs. agricultural water use.</p> <p>Please see Master Response 2.1, Amendments to the Water Quality Control Plan, regarding water available</p>

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		<p>programs when I was a kid. I used to love National Geographic. And as a third grader, you'd see parts of Africa where they're hand pumping water and carrying it in buckets and you felt so sorry for those people. You think, thank goodness I live in a more developed country. But that could happen here. I don't mean that in a trite way, but that could happen. It's happened in East Porterville; it could happen here. And that's a big concern for me.</p> <p>And, last summer, the Bee wrote that California has leapfrogged France and Brazil to become the world's sixth largest economy. And I can't believe in the world's sixth largest economy people will be [drinking] water from totes and taking showers at a trailer at a church before they go to school. That's what people in East Porterville do.</p> <p>It's been two years of misery for those poor people. So, the SED correctly states all Californians have a right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. Safe water is necessary for public health and community prosperity. So, we need a safe, clean, affordable, accessible water supply.</p> <p>So, I urge you to take a more balanced approach to addressing the fisheries concerns, which we all share. I urge you to be more active in developing water supply projects that ensure this region's basic right to a clean, safe, and affordable water supply is ensured. And I urge you to take a more systematic and surgical approach to addressing the ailing salmon populations. And, again, I fear the proposals will maybe do more harm than good on a human scale in our region. But we are here with you to work on solutions to improving the salmon fisheries.</p>	<p>for public health and safety as identified by the program of implementation.</p>
908	1	<p>MR. LAMB: I'd like to talk to you briefly and give a face and some figures associated with what I thought was casually brought up by some of the analysts earlier, the concept of fallowing in the Central Valley. So, my irrigation district, the Turlock Irrigation District, says no water for two years when they perform an analysis of the 40 percent flow rate limitation. What does that mean to me? The face. I'm seriously out of business on my family farm. My family, my employees take that hit. But the thing that really makes my heart sore, "sore" not S-O-A-R, S-O-R-E, is I wonder how bad this is for others and what are the impacts of fallowing.</p> <p>So, I ran a spreadsheet and I did some analysis based on Cornell University research. Basically, it deals with New York State and how many people are fed per acre of agricultural production, in a broad sense. I made some adjustments for the fact that here in central California we are unparalleled in our productivity, and so those numbers were adjusted a little bit. And, so, I hope you can see the spreadsheet.</p> <p>I apologize, sometimes these are a little bit small and hard to read. But mine only has one cell. So, this number right here is the number of people that are unfed by my farm. And if the TID doesn't deliver water to me for two years, these are the number of people that are unfed. I didn't say "underfed," unfed for two years. And that number is the reason why I decided to stand up here and talk to you guys because I don't think that's really been recognized, as how significant that really is.</p> <p>CHAIR MARCUS: It's clearly not the intent, so we have to sit and go over the materials when they come from TID. That's absolutely not the intent.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		MR. LAMB: Okay.	
908	2	I would like to encourage you not to take water from productive agriculture. Look at all the non-flow alternatives. And I also hear that some of those non-flow alternatives are not under your control. And I would suggest that if that's the case, we need to take a different approach. But we look at who's at the table, who has the ability to enforce those non-flow alternatives and leave production of agriculture in the Central Valley doing what it does so well, which is feed people.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
909	1	Additional costs of water harm farmers' bottom line. And this proposal could mean that small businesses like my family's may cease operation and sell out, abandoning our agricultural heritage. This would significantly impact the economic base for our many rural communities. Many jobs in this area are ag related, as we've heard a lot about today. The almond industry generates 104,000 jobs statewide, 97,000 of which are in the Central Valley. Reductions in economic output stemming from this proposal are more significant given the region's higher rates of poverty, lower educational attainment, and dependence on agriculture.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
909	2	We [California Almond Board] welcome greater coordination with the agricultural community ensuring that farming's long-term prospects and sustainability are enhanced alongside the regions' fisheries. To do this, we must develop a coherent water policy that combines analysis of surface and groundwater supplies under all potential regulatory limitations with increased resiliency to California's climatic variation. Making coherent policy isn't easy, particularly when current state law encourages groundwater sustainability and recharge while this proposal limits surface water supplies and could reduce groundwater recharge.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
909	3	It is imperative that the Water Board's Bay-Delta Plan amendments are consistent with other policies, like SGMA.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
909	4	The almond industry is investing in research for sustainable solutions for water supply, conservation, and storage, including groundwater recharge. Implementation of these solutions become more difficult if surface water supplies are reduced.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
909	5	The Almond Board supports a delay in making a final decision, as more time is needed for wider stakeholder discussions. We also encourage the Board to ensure that any actions taken reflect the impact of recent federal legislation.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
910	1	Dear Chairwoman Marcus, I write on behalf of the hundreds of students and thousands of families who live within the Denair Unified School District and would be adversely affected by your Board's stated intent to dramatically increase flows in our region's rivers. Our community is dependent upon wells for the water for our homes, businesses and schools. Already during the current drought, some residential wells have failed, causing distress and financial hardship for those affected.	The State Water Board is committed to the human right to water. As described in Chapters 13 and 22, using examples and information from the recent drought and detailing funding streams and sources provided by the State Water Board, the pre-existing conditions related to water supply and water quality would not be exacerbated by the plan amendments. For more information about southern Delta water quality and an explanation of why the salinity objectives would not affect water quality of the southern Delta, please see Master Response 3.3, Southern Delta Water Quality.

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			As discussed in Master Response 2.1, Amendments to the Water Quality Control Plan and Appendix K, Revised Water Quality Control Plan, the State Water Board will also take actions, as necessary, to ensure that implementation of the flow objectives does not impact supplies of water for minimum health and safety needs, particularly during drought periods. Actions may include, but are not limited to, assistance with funding and development of water conservation efforts and regional water supply reliability projects and regulation of public drinking water systems and water rights.
910	2	Recharging the aquifer is critical for long-term water sustainability. The orchards, farms and pastures that surround our district frequently use flood irrigation, an important component to healthy groundwater management. Your plan, unfortunately, require the Turlock Irrigation District to substantially reduce the surface water deliveries to those farmers impeding groundwater recharge.	Please see Master Response 3.4, Groundwater Resources and the Sustainable Groundwater Management Act, for a discussion on groundwater overdraft as a legacy issue, groundwater recharge, and SGMA in the context of the plan amendments.
910	3	I am concerned about the potential economic damage created by your plan and its effect on our schools. It has been estimated that thousands of jobs and hundreds of millions of dollars in economic output would be lost under your proposal. The Northern San Joaquin Valley already is one the poorest regions of California, with unemployment rates chronically in double digits. We cannot afford a blow with such widespread consequences.	Please see Master Response 1.1, General Comments, regarding economic considerations in the SED. Please see Chapter 20, Economic Analyses, regarding consideration of regional economic effects due to implementing the plan amendments, which includes jobs and fiscal analysis in Section 20.3. Please refer to Master Response 8.2, Regional Agricultural Economic Effects regarding potential effects of the plan amendments on employment.
910	4	I encourage you and your Board to take a sensible approach to water management that appropriately balances the many important needs, people, health and food production, as well as fish and the environment. I ask you to identify and assess the potential impacts and offer viable proposals to mitigate against those detriments.	Please see Master Response 1.1, General Comments, and Master Response 1.2, Water Quality Control Planning Process, for information on the State Water Board's consideration of beneficial uses.
910	5	I urge you to work with local water, agribusiness, political, community and school leaders to identify the best ways to accomplish your goals without bringing undue harm to our residents. Their families are the hardworking people of this region.	Please see Master Response 1.1, General Comments, for information regarding the objectives of the plan amendments, the public outreach process and voluntary agreements. Please refer to topic specific master responses for discussions regarding the impacts on agriculture, service providers, and economic considerations.
911	1	My family has farmed here for over 100 years, and what you are proposing is the biggest threat to my family passing the farm to the fifth generation of our family.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
911	2	I urge you to look at other proposals, such as more storage, rather than just dumping the water. It seems to me if you want more water for a fish flow, you should save it with more storage during wet years. It's like a bank account. You build it up and you spend it during the dry times. The more water stored, the more water available for all of us. So please go back to the drawing board and start over.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
912	1	I would like to remind the State Water Board that their highest priority, based on their own authorizing legislation, the Porter-Cologne Water Quality Act, states as follows, this is directly quoted from Section 106: "It is hereby declared to be the established policy," of this State of California, that's my inclusion, "that the use of water for domestic purposes is the highest use of water, and that the next highest use is for irrigation." It doesn't say anything about fish, I'm sorry.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
912	2	The analysis in the SED did absolutely nothing about probabilistic determination of drought years, of increasing levels of drought years, coupled with the increasing--or the decreasing amount of water available because of the snow melt happening earlier and rains instead of snow, we're going to have less snow. The end result of that analysis needs to look at our	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		ability to store water for the latter parts of the summer. Because if we don't, as you already know, we're going to end up with dry rivers, which I suspect won't help either the fish or the salinity levels.	
912	3	The experts that evaluated the SED made a comment about, essentially, the fact that even given the flows, there is no way to really guarantee or determine what the impact will be on the fish. So the second recommendation is do some probability analyses to figure out whether or not this solution would even work, given the other environmental factors necessary.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
913	1	I think when they did the water contracts for the Delta-Mendota and the California Aqueduct, they treated the Delta as a lake, and that has created the problem that you are having to address now. And you're trying to treat the symptoms instead of the problem. Is there any way you can treat the problem? I hope you can address the problem because just in -- what is it -- because within 1970, there was around 4-, to 5,000 young striped bass in the Delta that the California Department of Fish and Wildlife counted, new, young, striped bass. In the last count, was in 2010, there was 34 young striped bass. And if you correlate the striped bass, the Delta smelt, and the salmon population, they probably all decreased at the same time.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
913	2	And this little bit of inflow that the Merced, San Joaquin, and the Stanislaus River are going to inflow, if they do not reduce the pumping while those waters are going, going, going down, it will not help the salmon.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
913	3	And this little bit of inflow that the Merced, San Joaquin, and the Stanislaus River are going to inflow; it won't help the Delta farmers, where they can't grow -- they don't grow their asparagus anymore because it's too much salinity there.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
914	1	It's a pleasure and honor to be here today to represent economic development in Stanislaus County. And I'm here to voice opposition to this proposal and to speak on behalf of the many companies and employers that we have in our region. You've heard a lot of discussion about economic impact. And I had the opportunity to serve on the economic panel where we recently heard the Water Board's economic impact analysis for this proposal. And I've been in this business for a long time. I have a master's degree in urban and regional planning. I know economic impact studies. I've been doing these for 30 years all around the country. That economic impact study is seriously flawed. It did not take into account all of our processors, the supply chain, residential uses.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
914	2	Just think, if water rates rise here, think about all the people who are underprivileged, who suffer from lack of income and other challenges they face. Think about what it will mean to them when the water rates go up. Think about all the people on fixed incomes in our county who can't pay their bills when their water rates go up. So I just want you to consider the impact.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
914	3	I would also argue and ask that we take our time. You know, in 1787 our Constitution was created. The way it was created is people with very divergent opinions came together and they worked it out, people from small states, people -- the delegates from large states, they worked it out. Their whole intent was to find a solution that worked for everybody. If that can be done at a national scale, it certainly can be done in the State of California.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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915	1	<p>I own a small farmer. I wanted to put a face on a small farmer for the Board. I farm 40 acres of almonds and walnuts. I'm fortunate that I'm in a good water area temporarily, until the SGMA gets into play and the water resources issues that we're talking about today.</p> <p>As a small farmer, I produce income that probably feeds at least 20 or 30 other people in the course of my normal purchasing of goods, services, farm labor, we could go on and on and on. And the dollar that I spend probably has at least a ten point multiplier on it. So I would like to just have the Board consider that small farmers need that surface water and they need the groundwater. And without it, this entire valley will dry up and blow away.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
916	1	<p>I'd like to bring you back to a point in time in 1977-1978 when there was a fight over whether or not New Melones was going to be filled. I was an executive secretary of a group called Fill the Dam.</p> <p>But it's very important to understand that with that focal point and the decision to fill New Melones, it gave the state and the federal government an opportunity to make full use of New Melones for other uses. So the promises that were given to Calaveras County for recreation, for other uses just didn't happen.</p> <p>And the result is, is that even last year, we were forced to buy power off grid because New Melones was being shut down as a power generation location. As you recall, we actually had to do an extension of Lake Tulloch, because that is part of my area, to ensure that we were going to provide adequate water supplies to our consumers there.</p> <p>All of this plays into whatever happens to us and the watershed and the headwaters area of this part of California also happens here. So people should realize that there is a conjunctive use that needs to be looked at. I'm involved in the creation of the CSA (sic) for Calaveras County. And I can understand that there is going to be a bump against SMGA as to how do we make this all work as we look at these flows, and then we also look at how SGMA is going to play out. This is a -- this has to be a long-range effect.</p> <p>But, without a full New Melones over these last 35 years, a lot of what's been able to be accomplished with flows and with salmon, et cetera, wouldn't even be a discussion because there wouldn't be a reservoir there.</p> <p>So the first thing we've got to do is ensure that we build adequate reservoirs and adequate water supplies to service our areas. That has to come first. It has to be people over fish, that's the bottom line.</p> <p>If we can't sustain our people and the economy of our area, there's no point in talking about fish. And unfortunately, I think this conversation needs to come back to the reality of what can we do to support our communities in this area as we go forward.</p>	<p>The commenter generally discussed the use of New Melones, the general implementation of SGMA in Calaveras County, and suggested building reservoirs and water supplies to [the] area to benefit "people over fish". The comment does not raise significant environmental issues or make a general comment regarding the plan amendments. As such, no further response is required.</p>
917	1	<p>If you take our water, the most basic resource that we as farmers need to continue our livelihood, then this will end that livelihood and the business will fail.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
917	2	<p>I'd like to address what this debate is really about and what it's not about. It is most emphatically not about the survival of native fish species. And the reason I say that is that over the past several years, hundreds of millions of gallons of water have been released from the New Melones Dam down the Stanislaus River and the fish population has not</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>increased, in spite of those efforts.</p> <p>So what is this really about? Well, I would posit that the real reason that we are having this debate is that the State Water Control Board and the Governor have tunnel vision.</p> <p>The Modesto Bee on Sunday fairly framed for the public what this really is, it's a water grab targeted at an industry, agriculture, and valley communities which in this Plan's cynical, political calculation are expendable in order to provide water for the larger population centers in the south. Ultimately, you need our fresh water to push back encroaching saltwater in the Delta so the twin tunnels remain theoretically viable.</p>	
917	3	<p>Staff's estimate of \$64 million impact is laughably low. That is almost insulting. The impact will be horrendous. And we ask that you please reconsider this Plan.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
918	1	<p>Recently, in Coronado, Governor Brown said, and I quote: "We are taking whatever steps we can to find allies and partners to forestall the catastrophic changes that are occurring in the air, in the water, in the lands, and to our habitats."</p> <p>I can relate to the Governor's concerns, but I do not believe the proposals for our water at this time have really anything to do with that. Stanislaus County alone can expect over the next 45 years to have a population of 836,000 people. The population of California is to grow in that same time to at least 50 million people. We do not expect any more rain to fall from the sky to accommodate our increasing population. Taking our present water sources, our lifeblood, our water bank and spending it elsewhere, I believe, is a willful disregard of our county's needs.</p> <p>We're here today to help prevent the catastrophic changes the Governor recently spoke about. And we are concerned for our people, now and in the future. The plan for this water grab is deeply flawed and is the heart of the taking plan and should not be implemented. The people built their lives here. They depended on the sustainability of our water source for the present and for posterity's sake. We should not be forced to depend -- or to expend our water bank beyond the realistic needs of our county.</p> <p>This is a basic principle. Our forefathers created a fertile valley on good soil with their dams. We are already sharing the bounty of the Tuolumne from the Hetch Hetchy to Crystal Springs near Silicon Valley. And we strongly believe that there are other considerations for your plan that have been overlooked.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
918	2	<p>The salmon is really not just a local problem. Salmon all up and down California to all the way into British Columbia are in decline, as well as they are on the East Coast, as well as they are in Europe. There is, however, one bright spot in all of this. There's an Indian -- I should say a native, the first person fishing village on Vancouver Island that has done the first salmon factory high and dry, away from the ocean so there's no contamination of anything that might be native. And the 'Namgis First Nation has had an incredible stride in production in a pristine, controlled factor that has set high standards for ecofriendly aquaculture.</p> <p>It has been recognized by the Monterey Aquarium for its friendly -- excuse me, for its innovative, practical, forward-thinking approach to the production of valuable food sources. They are growing salmon twice as fast in ideal conditions with half as much food. Other locations across the country are starting similar land-based facilities. There is an option for</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>our food source.</p> <p>Meanwhile, the introduction of native salmon in any locale is costing millions of dollars to introduce.</p>	
919	1	<p>I have a dairy in the northern part of Merced County. And I get my irrigation water from the Turlock Irrigation District. I'm a third generation farmer. My grandfather started the dairy in 1917 and next year will be 100 years that we've been in business.</p> <p>There have been many challenges to keep the business going for 100 years. But if this SED proposal goes through as written, this will be the one that ends our business. Without the ability to raise much of our crops we need to feed our animals, we will not be able to stay in business.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
919	2	<p>Pumping groundwater is not a sustainable option. Increased pumping will only hasten the destruction of the aquifers. Once subsidence has occurred and those water strata have collapsed, the ability to store water there is gone forever, helping to destroy California's largest reservoir, the underground one, which is just another devastating consequence of this proposal.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
919	3	<p>I would like for you to do me a favor, if you would. When you go to bed tonight and your head hits the pillow, when there's finally peace and quiet from all the day's activities, and you lay there warm and secure in the knowledge that you'll be able to pay your mortgage, pay your bills, put food on the table, I would like you to think about the thousands of people that you will be taking that away from, businesses you will cause to fail, workers who will lose their jobs and wonder how they'll pay their rent, put food on the table, and even elderly people on fixed incomes whose electric bills you will drive up.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
919	4	<p>There is not a single person who lives in this area who will not be harmed through this proposal. It would be one thing if there was no other way to protect the fish, but there is. I don't know if what you're proposing is legal, but I guess the courts will decide that. But what I do know is what you're proposing to do to the good people of this area is immoral when there is other ways to protect the fish without devastating this area.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
920	1	<p>On October 9th, the Modesto Bee ran an article titled, "Alarming Findings on San Francisco Bay Health." Scientists from the Bay Institute and UC Davis explained how the San Francisco Bay and estuary have been damaged and is being choked by the lack of fresh water due to water diversions and recent drought. The effects of this are not just felt by salmon, but on all organisms in the ecosystem, and these affects are far ranging.</p> <p>I have hiked, canoed, swam, inner-tubed, and backpacked along most of the Tuolumne River. I have drank fresh water Lyell Glacier. I have marveled at Waterwheel Falls in the Grand Canyon of the Tuolumne. I have watered my garden and fruit trees with water from the Tuolumne River. In most places in Modesto, I can open a tap and drink water from the Tuolumne River.</p> <p>The Tuolumne River is very precious to me. The health of the river and the downstream estuary is important to the entire State of California. I hope that all of us living in this part of California can find some common ground to include an increase in the flows and the health of our local rivers.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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921	1	I represent the 4th District of the Calaveras County Republican Party. We have the New Melones and Lake Tulloch in my particular district. And I can tell you that everyone that I've spoken to in Calaveras County is against this new proposal. We're concerned, basically, that there was not a full CEQA done. Instead, there was the Substitute Environmental Document (SED).	Please see Master Response 1.1, General Comments, acknowledging the concerns of elected representatives and other community members. Also, please see Master Response 1.1, General Comments, regarding the programmatic approach and analyses in the SED, a general discussion of the scope and methods of the impact analyses, and the difference between programmatic and project-level analyses and for information regarding the impacts evaluated in the SED.
921	2	I'm here today to talk about cyanobacteria. As you probably know, there was a bloom in the San Luis Reservoir this year, and it was closed to swimmers and dogs because of this. We're concerned that Melones and Tulloch could possibly grow the cyanobacteria because of the lower water levels, which will give us more warm water which is what it thrives in. The drought also adds to this danger. As you know, we've been under the drought for a long time, so that's a problem too. This could be an unintended consequence of increased water flow from Melones, and we're very concerned about it. I live near Pinto Lake in Watsonville. And as you know, that particular lake is considered to be one of the most toxic lakes in all of California, and that has the cyanobacteria. And there were a number of sea otters that were killed from that, so it's a major problem.	Please see Master Response 1.1, General Comments, for additional information on the plan amendment's anticipated environmental conditions as related to harmful algal bloom formation and maintenance.
921	3	I believe the cyanobacteria should have been discussed with local water districts, and it was not. I reached out to the manager of our particular water district and found out that he was not contacted. There was no discussion or plans on how to treat water, should there be cyanobacteria in our reservoir or Lake Tulloch or perhaps New Melones. The problem with the challenge of treating the water is that there are extra toxins and intracellular toxins. And the intercellular toxins will explode when they die, which will contaminate the water treatment plant.	Please refer to Master Response 1.1, General Comments, regarding the potential for implementation of the plan amendments to result in environmental conditions conducive to the formation and maintenance of harmful algal blooms in the Delta and New Melones and New Don Pedro reservoirs and Lake McClure.
921	4	I believe that the Delta Plan should have had these discussions about cyanobacteria. We all believe that. We believe that a lot of the water districts, and there's probably people here from water districts that are ill-prepared for this possibility. And we would like to have this changed and have you maybe do some workshops with water districts to investigate what the possibility of this particular bacteria could cause. You know, it's a very deadly disease that can attack the liver. It can be a problem with the nervous system. We would like to see you reach out to the water districts and investigate it.	Please see response to comment 921-3.
922	1	We don't have enough water for everyone. And that's a very hard reality. And fortunately for me and unfortunately for you, you have to address it. Our rivers are dying. You can walk a short ways and look at the Tuolumne River. It's clogged with water hyacinths, it's dirty and it doesn't flow. We have to face those facts. The rivers are in trouble. And I think everyone in the room would agree, we need living and sustainable rivers for all of us. Those farmers of 100 years ago were the best people on earth. But they were able to farm because there were sustainable rivers. They're not sustainable now. We need to restore the sustainability of the rivers. The salmon are just a part of that. They're part of a larger complex ecosystem which provides life for all of us. We're all part of that web of life. I would urge you and everyone in the room to realize, we're not all going to be happy. You know, every time somebody mentioned property values, my heart sank. I've lived here since 1977. And, you know, we're all in almost a state of panic about the economic losses. But I would urge the Board and all of us to step back a little bit. All we have is objective science here. Every one of us is going to fight hard for what we have and what we want. But I would urge you to listen to objective science for sustainable and living rivers.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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923	1	Applaud integrity, encourage you to stick to your science - 60% minimum. 30-50% is already a compromise. Your own studies show [current] flow is insufficient to support ecosystems. Just because people on all sides seem angry doesn't mean you've found the right balance.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
923	2	Encourage more education, better information. Non-flow management measures to help fish, agriculture and jobs. Publish and present water users: crops, jobs, export of products and profits, groundwater recharge by natural healing of floodplains.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
924	1	I don't think good stewardship is saying to heck with the fish. I'm too busy to fish anyway, so who cares? I don't think good stewardship means too bad that you folks in the Bay Area and So Cal. We told you not to move there but you wouldn't listen, so live with the consequences. And I don't think it means stripping the valley of its economy just to benefit a couple select groups of people and a select group of wildlife.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
924	2	<p>One of the things we sing at Christmastime is peace on earth, goodwill toward men. Do we mean it or is it something that we just sing about a couple of times a year, then put it back on the shelf and sing it next year? Is the mantra going to be peace on earth, goodwill toward men to the San Joaquin Valley, while we grab your water? Oh, it's not personal, it's just political. Good luck to you.</p> <p>Being blind, I've never seen a sunset, the mountains, the ocean, my wife's face, or even the signs about "Worth the Fight" or the slides today telling you what your website was. But I can see, as things currently stand today, December 20th, 2016, this proposal is not fair. I don't have to have 20/20 vision to see that.</p> <p>So let's get it figured out. Let's do the right thing, even if we have to go back to the drawing board, it's worth it. Excellence is worth it.</p>	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
925	1	I'm pleased that the concerns of our communities throughout our basically seven-county valley region and the negative effects of the policies that put the fish above people has been recognized. Increasing the amount of water used for fish flows from our rivers and reservoirs, when we should be primarily focused on conserving and creating new storage, will be disastrous, of course, like you've heard for our economy, our local ecologies, our recreational uses, and agriculture and our rural communities.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
925	2	In Calaveras County, I recall the benefits of local water use and recreational use was promised to be provided in return for local acceptance when the Corps of Engineers needed to support and get the support for the New Melones Reservoir Project in the '70s. It seems as if there's very little institutional memory in that regard.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
925	3	It's being proposed to nearly double the unimpaired flows portion of these water uses for our fish flows from our rivers and reservoirs. What happened to the concept with conserving water in a drought? There seems to be no accountability for the ramifications and these negative consequences that are affecting people.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
925	4	I suggest that the State Water Board staff and Board Members focus more on non-flow measures.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
925	5	I support taking suspend water releases for fish flow above the minimum necessary levels until reservoirs are filled. And I urge limiting or eliminating unimpaired flows until our reservoirs are refilled and responsible policies are put in place, policies that consider the	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		<p>best interest of the agricultural community and the people of the rural counties that are the counties of origin for the water that we are discussing.</p>	
926	1	<p>I'd like to address the argument that's been made today that you should not consider reduce -- should not consider releasing more water until you deal with predation and habitat improvement. And the gist of what I'm thinking is that, as regards to predation, the big issues are introduced species, one of which is the striped bass, which was introduced I think around 1880 into the San Francisco Bay Area.</p> <p>And with the Central Valley project and the State Water Project, those fish are now indigenous in California. So, although they are voracious predators, the whole idea of effectively eliminating them or reducing them is problematic, at best. And I would note that since they've been around for such a long time, as have the warm water freshwater species like smallmouth and largemouth bass, the salmon populations have coexisted with these predators. And we have spent millions of dollars to the irrigation systems' credit in trying to fix the habitat, but it hasn't worked. So, we're basically left with very few alternatives.</p> <p>If you want to try and preserve the salmon, the only thing that hasn't been tried is releasing more water.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
927	1	<p>The Board's policy of draining water when you're looking for solutions, last year one flow of 30,000 acre-feet of water was taken out of Tulloch and Melones, that moved at a cost of \$21 million, and we basically moved nine fish at a cost of \$2 million a fish.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
927	2	<p>Your new proposal would move 104 fish down the rivers, but you might say that's wrong, so let's inflate it by a factor of ten and move it to 10,000.</p> <p>Well, you're using fish flows to increase salmon. Fish hatcheries run by the State of California and the U.S. Department of Fish and Game are releasing salmon into our rivers. Do any of you know how many fish will be -- salmon -- will be released in the California rivers this year? We conducted a study last week. We found the answer. This year, between 37 and 42 million salmon were released into California rivers, just by the federal and state agencies. Therefore, the very idea of making a difference of 1,104 -- or let's say 11,000 fish is ridiculous.</p> <p>We can now -- and you're looking for solutions. Your solution is the new federal law which now allows hatchery fish to be counted towards the ESA, and you're trying to basically adhere to the environmental -- the Endangered Species Act. Well, under -- all this all changed when President Barack Obama signed this law. Basically, the number of fish, if you go to the 11,000, that amounts to 1/370,000th of 1 percent of the fish this year that will be planted in California rivers, salmon, by state and fish hatcheries.</p> <p>So every elected federal and state representatives of the region, democrat and republican, share a view that you need to cancel this order, end it now. And I think the United States Congress and President Barack Obama have given you a perfect way out by using hatchery fish and ending a policy that simply doesn't work.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
928	1	<p>I have a problem with your Board. All these people out here, including me and my 14 employees at my dairy, have a stake in this proposal of what you're doing. I don't think any of you Board members have a stake in what's going on here. You're not going to lose your</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>house. You're not going to lose your farm. You're not going to lose your family.</p> <p>And I don't feel, being in immigrant and knowing how important this country is to me, every function, I sing God Bless America. But I just don't feel right that your Board is dictating to agriculture, our people, that you can take our water. I'm sorry. It's not going to happen. We're not going to roll over and play dead. We never have, and we sure as heck aren't going to start now.</p>	
929	1	<p>I remember fishing down at the Tuolumne River just downstream from Ninth Street. And before sunrise, we would wade out in knee-high deep water and we'd fish into the sand with our hands trying to find clams as fish (sic) for catfish. And we'd always catch catfish all the time. We'd also catch striped bass just below Dennett Dam up here. Twenty years later, after that, I wanted to take my sons down to the river so they could experience the same local fishing that I enjoyed when I was their age, and that was about ten years ago. Sadly, the clams were very hard to find and the fishing holes were long gone, the striped bass were no longer around. However, the water level, as far as my perception was, and the temperature had always been the same. That didn't change. And, yet, so from spending a lifetime of fishing the local rivers, I submit to you that the water flows and temperatures seemed pretty much the same back then, back when the fisheries were more abundant, back when I, as a kid, would witness hundreds of salmon passing over Dennett Dam in Modesto.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
929	2	<p>I fished many times out of the Fox Grove fishing access catching several species of fish including a 5 lb. largemouth bass on one occasion. When I took my sons up there just a few years ago we could hardly catch a bluegill. The river level and flow was usually always the same with only small fluctuations following rains or the normal increased flows during the cold spring run-offs though data logs may state otherwise.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
929	3	<p>Please consider the following as possible root causes or alternative solutions to restoring our rivers, other than basing it on an assumption that releasing 40% more unimpaired water out into the ocean would bring back approximately 1,000 more salmon. If you want to improve something by 1,000%, it is easier to have 500 items improve by 2%, than it is to have 2 items improved by 500%.</p> <p>-- What impact has pollution been on these waters? The last time I fished the Stanislaus below Goodwin Dam I filled my back pack with trash left along the river's edge.</p> <p>-- What affect might poaching be? Never once was I checked by a Fish & Game Warden in all the years fishing, yet amongst all the trash I gathered were several empty worm cartons in an area restricted to using live bait. If those who fished illegally didn't care about using bait, they probably didn't care about catching/poaching salmon out of season. As part of all the scientific evidence that has been gathered to support increased water flows, is it known what impact an increase in Department of Fish and Wildlife personnel for enforcement and educational encounters could be on saving salmon and protecting our rivers ecosystem?</p> <p>-- What if we spent 70 million dollars on restoring habitat and spawning beds along our rivers? How much would that benefit the fish and wildlife and Delta ecosystem? How many extra Game Wardens could some of that money paid for?</p> <p>-- What about toxic chemicals? How much illegal waste from Methamphetamine labs has been dumped in these rivers? Have there been any studies to determine how exposure to</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>waste affects reproduction and health of the salmon. This should be a major concern that did not always exist.</p> <p>-- What about the impact of not controlling the water hyacinths and how does the lack of photosynthesis affect the food growth. I have noted over the recent years mats of water hyacinths that would cover several football fields, especially in the San Joaquin River. What studies have been done to consider the impact this has on fish moving both upstream and downstream? What impact would it make if we increased the number of crews trying to manage the Aquatic Weed Control Program? How about using inmate work crews to help with the process, has that been considered?</p> <p>-- Have you looked into the impact that predatory fish such as black bass and striped bass have on the parr or baby fish? Last time I caught a trout its stomach was filled with nearly a dozen babies. Trout fishing on these rivers have size and creel limits, with most places being catch and release only while a striped bass must be 18 inches to keep, and then it is only a limit of 2. Suppose we increase the fish limits or decrease the size restrictions, could this help the salmon while still maintaining adequate numbers of striped bass?</p> <p>-- A while back I was fishing for stripers on the Stanislaus out of the Oakdale Recreation area; I saw quite a few in the 14 to 16 inch range and do they move fast. I did not catch any stripers but I did catch several large carp and sucker using a 3 inch minnow imitation soft power bait lure, in smelt color, to the point where I gave up fishing for stripers. What impact do these so called trash fish have on eating the juvenile salmon?</p> <p>-- What would be the impact of a stronger current when tiny fish might try to swim upstream to elude being consumed by fish a thousand times its size and strength? How much more debris and snags might develop from increased flows causing the salmon running upstream to stress more and look for alternate routes? Or creating better hiding spaces for the predatory fish feasting on the fingerlings.</p> <p>-- Please consider the numerous "non-flow" measures that should be taken to reach a reasonable win-win solution rather than causing a major negative impact to our communities.</p>	
929	4	<p>What impact would increased flows and lower water temperatures have on recreational swimmers or those taking in a leisurely float trip? What is the scientific projection for increased drownings at the cost of hoping for an increase in salmon in the rivers when a much safer alternative would be to raise more salmon in the hatcheries or on farms?</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
930	1	<p>On behalf of my membership [Manufacturer’s Council of the Central Valley] and the tens of thousands of people that they employ, we are deeply concerned with the flawed economic impact analysis. We found that the analysis has completely failed to capture the region’s economic and social picture. The analysis demonstrates potential losses in the agricultural sector only. Although those impacts are vast, they are not the only factors to be considered.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
930	2	<p>Some of the largest food processing companies in the world are located and headquartered right here [Central Valley], companies like Gallo and Foster Farms and Hilmar Cheese, Morning Star, just to name a couple of them. These organizations not only create amazing products, but they also provide the much needed employment opportunities for our severely disadvantaged communities.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>Stanislaus County alone produces \$8.6 billion in output in the food processing sector and employs 25,000 workers. In our three-county northern San Joaquin Valley, food processing produces \$17 billion in output and employees 50,000 workers. In the small little City of Turlock, 33 percent of their jobs are from food processing. Socially, we're completely disadvantaged. We face housing inadequacies, low education levels, high crime rates. Disadvantaged is an understatement. So when you take into consideration all those other factors, you'll see that your economic impact is, again, severely flawed.</p>	
930	3	<p>Please do not add to the problems that our region faces with what this plan has proposed. I implore you to talk with the Districts. They know the rivers well. We want a vibrant and healthy river system. They want it to. You want it. We all want the same thing. We just have to start rowing in the right direction together. So please come back with a different plan that has all those considerations.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
931	1	<p>I am really concerned about the bigger picture of our environment. And if we can step back a minute and see, that the backdrop we're working against is our continued human population growth and a limited supply of water. And, so, we have to try to divvy out water to all stakeholders, which means an ever-growing human population but also all other forms of life here.</p> <p>And this is just indicative as something even bigger. Our entire planet is going to be getting shorter and shorter in resources. Water is what we're talking about.</p> <p>So, I just am here to thank you for the work that you're doing and encourage you to continue reaching out to everybody. We can do this. We can come to an answer. Everybody can have a piece, but nobody can have everything they want. So, let's try to look at it that way.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
932	1	<p>I want to talk briefly about the economic impacts of this proposal on the Stanislaus County economy.</p> <p>The SED grossly underestimates the impacts to this county. Ag is Stanislaus County's number one industry. It is a \$4 billion farm gate industry and it employs 38 percent of the population that either works directly or indirectly in agriculture. Eight out of ten of the county's largest employers are ag related. Companies such as Gallo Winery, Del Monte, Seneca, Foster Farms and others employ thousands of people.</p> <p>A 40 percent unimpaired flow from our rivers will devastate this area. The county believes that this will fallow as much as 200,000 acres and cause \$1.7 billion in farm gate value loss, along with 14,000 jobs. The effects on property values, employment and the economy will be tremendous.</p> <p>Much of our land in this county is in orchards, peaches, almonds, walnuts. Although we grow about 200 different crops, there's a lot of it in trees. And permanent crops have to have a reliable source of water. There have been billions of dollars spent on orchards and infrastructure of pipelines, irrigation systems, processing plants in ag-supported industries. We are reliant upon the water to keep this economy going.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that make a general comment regarding the plan amendments and general information regarding the economic analysis.</p>
932	2	<p>The SED says that we can use groundwater to make up the difference in the loss of surface water. But I can tell you, there is not enough sustainable groundwater supply to go around. In this county, we've had scores of wells go dry this year during the drought. And just relying</p>	<p>The SED and plan amendments do not require or encourage groundwater substitution as a response to reductions in surface water. Rather, the SED reflects the historical local response to increase groundwater pumping when surface water availability is reduced. It will be up to local entities to determine the precise</p>

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		<p>upon groundwater to make up the surface water loss is just not going to do it.</p> <p>The SED does not include any analysis of the interplay between the unimpaired flows and how much groundwater would be available under SGMA. If we have our groundwater taken away through SGMA or very regulated, then the surface water is being reduced. It puts us in an impossible situation to continue with our economy.</p>	<p>actions that would be taken in response to implementation of the plan amendments, with or without the future condition of SGMA.</p> <p>SGMA requires local groundwater sustainability agencies (GSAs) develop and implement groundwater sustainability plans (GSPs) to sustainably manage local groundwater resources within 20 years. Variables, such as surface water availability and the amount water needed for groundwater recharge will be considered by GSAs as they develop GSPs. Since no GSPs were developed before the release of the Recirculated SED, it is unknown what actions GSAs will take to achieve the sustainability goal. Therefore, any impact assessment would be speculative. However, SGMA was properly included in the analyses as an existing legal requirement to prevent further degradation of the groundwater basins and as a potential cumulative limit on future irrigation supplies in Chapter 9, Groundwater Resources, Section 9.4.3, Impacts and Mitigation Measures, and Chapter 22, Integrated Discussion of Potential Municipal and Domestic Water Supply Management Options, Section 22.4.1, Potential Impacts of LSJR Alternatives.</p> <p>For further discussion on potential increases in groundwater pumping, groundwater recharge, and SGMA in the context of plan amendments, Please see Master Response 3.4, Groundwater Resources and the Sustainable Groundwater Management Act.</p> <p>For responses to comments on potential economic impacts, please see Master Response 8.1, Local Agricultural Economic Effects and the SWAP Model and Master Response 8.2, Regional Agricultural Economic Effects.</p>
932	3	<p>Irrigation districts have had the water rights on the Tuolumne River for 130 years. The Don Pedro Dam is privately owned. There no state or federal money in this system, and the water just cannot just taken away.</p> <p>In the 2014 Water Bond the people of California voted to increase water supply. They realized that California does not have enough storage. Yet with this proposal the storage that we have will be eliminated. The Don Pedro, Exchequer and Melones Dam will never be full again. And this is just exactly the opposite of what the people of this state really wanted. The reservoirs are there for the benefit of the people. They're owned by the people and the irrigation districts, and they should be left alone.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that do not raise significant environmental issues or make a general comment regarding the plan amendments.</p>
932	4	<p>The SED is a weak and misleading document, void of any honesty, science or common sense. And the theft of our surface water would destroy our economy, reduce property values and our tax base, and throw thousands of people out of work, and impact our drinking water supply. And this is for an increase of 1,100 salmon, all of this.</p> <p>If this is really about increasing the salmon numbers, there are many ways to do that. The irrigation districts have a plan, and so does the county. This can be done without destroying the economy of this region.</p>	<p>See Master Response 3.1, Fish Protection, regarding the use of the best available science, SalSim, and the benefits anticipated from implementation of the plan amendments.</p> <p>See Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.</p> <p>Please refer to Master Response 1.1 and Master Response 1.2, Water Quality Control Planning Process, regarding reasonable protection of beneficial uses.</p>
933	1	<p>We are trying to work together and strive to better our agricultural industry. As a fourth-generation Marchy dairy farmer, I'm fulfilling our duty and producing a sustainable and safe food supply. But I can only continue this heritage with the most the valuable resource, water.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
933	2	<p>I'm a proud citizen of Turlock, and I'm proud to be from a state that considers the disadvantaged when it proposes new laws and regulations. This appears to be absent from the proposal. What effort was put in to study how the SED impacts our disadvantaged communities? We've already seen many domestic wells run dry in our area. How will</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>families that are on fixed and low income be able to handle this additional burden?</p> <p>This proposal is simply not sustainable from many aspects. It impacts families and individuals who are most vulnerable and do not consider -- and does not consider the effects on those in our society that should be placed first when considering new regulations.</p> <p>Access to clean drinking water is essential to the realization of all human rights. Please consider the data and the facts before you and hear the voices of the many in our community that cannot protect themselves.</p>	
934	1	<p>These comments are in response to the California Water Bill Measure from the House of Representatives in the Senate. The proposal proposes 27 desal projects, which is wonderful, 105 recycling and reuse projects, 335 million for water storage funding, 558 million in overall funding, all worthy projects. And, especially, there's something for Flint, Michigan, with the water treatment plants there. So, I think this is a great project.</p> <p>This new bill is going to fund more desal, efficiency, and recycling projects. It's 91-page California package. It's added to the Water Infrastructure Improvements for the Nation Act. It will support 11 billion in projects nationwide.</p>	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
934	2	The State Water Quality Control Resource Board (sic) is determined to confiscate half of our river water from February 1st to June 30th so water can be shipped south through two 40-foot diameter tubes. These months, February and June, are the most important for reservoirs receiving melted snow. And this water grab could turn our communities into a dust bowl. Fifty percent of Sacramento River goes to the ocean already. Who will go extinct first, salmon or valley farmers?	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
934	3	Folks, this isn't about fish. It's a water grab, and to heck with our quality of life, economy, farms, and the water we have come to depend on. We must learn from history, we must fight to hold on to our water. We're giving more water and not getting anything back. We must save our water so we can help save our environment during a drought.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
934	4	<p>No amount of additional water will ever be shown as sufficient to restore Delta fish species smelt and salmon. The professional environmentalists' endgame is to bring an end to Central Valley agriculture by cutting off the water that Valley agriculture needs to feed the state, the nation, and the world; water that our entire economy depends on.</p> <p>Regulatory agencies, that is, State Water Resources Control Board, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, are the straw men being used to achieve that goal. Irrigation districts and agriculture reps have to be careful of entering into any agreements with these organizations that would jeopardize agriculture and irrigation districts' positions.</p>	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
934	5	<p>After spending millions of dollars and wasting millions of acre-feet of water on outflows and inflows, CALFED has never achieved any of its goals and objectives or deadlines. Not one. CALFED couldn't prove that even one fish has been saved.</p> <p>Hopefully, all of us have learned the lessons history has taught us over the last 20 years, bureaucrats, unelected and held unaccountable to the general population, are a danger to our way of life and our very survival.</p>	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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935	1	<p>There's just not enough [water] to go around, farmers need to utilize it better. I'll tell you, our company, we sell irrigation equipment to farmers also, and they've put huge investments recently to improve their water-use efficiency, to make better use of that water, and they've done so and improved their production. And they're going to continue to make those investments, at least I hope they do. But they're going to do it better and continue to be great stewards. I mean, they have to work in harmony with the land all of the time.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
935	2	<p>Sometimes you got to protect environment from the environmentalists. And I don't mean to disparage anybody with that. But, a lot of times, there's really good intentions and good ideas that have really negative, unintended consequences.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
935	3	<p>This 40 percent flow is not a natural flow for the river. And maybe I kind of think from a simplistic thing. I wasn't a biologist or anything. But I think about before there were people, before there were dams, you know, 10,000 years ago or longer, I mean the river has been around for a long time, there wasn't people monitoring flows, there wasn't people checking temperatures, and those rivers continued to work.</p> <p>And you think about what happened. Well, you had the spring snow melt and runoff, those lives ran full, in fact, so full they ran over and flooded, and those hatchlings were washed out to the ocean. They lived out there. Late summer, fall, you know, those rivers barely ran. In some years, maybe parts of them went dry. And the salmon survived. But it kept those predator fish in check.</p> <p>Well, now because of dams, of course, we need dams to protect communities and lives from flooding, we needed to provide water for drinking water and food production, but we're able to spoon feed that water and we probably keep those predator fish around a little more than normal.</p> <p>And I'm scared this 40 percent flow is maybe not a normal flow and what consequences is that going to be? Will we be better off -- maybe we run it full for a couple of months like it normally would and then slowly shut that off. And if there's a drought and the river does go a little drier, that's okay. I mean, life finds a way. It's done that in the past before us and it will continue. But we maybe need to work more in harmony with nature just like farmers do. So, I encourage you to do that.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
936	1	<p>This is not a Central California issue. This is a California issue. The Central Valley benefits the entire state of California. We just need our water. There is a 133 year history of using our water to benefit all of California. Taking more of our water will hurt the entire state. This community has used our water to benefit the entire state of 40 million Californians.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
936	2	<p>The proposed water restrictions could have cost our local economy 1.5 billion dollars in 2015. That is 15 billion dollars in 10 years. If that income is taken away from us, it will result in local poverty and the rest of the state will have to subsidize us. We want to stand on our own feet and contribute to the 40 million Californians, not be subsidized. We just need water.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
936	3	<p>We are mandated by the state to keep our water aquifer up, to keep our water quality good for healthy drinking water. We have had water rights for decades.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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936	4	Please please, please take into consideration our 133 year history and record of using our water well and sharing it with others and using it to benefit all of California.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
937	1	I have to wonder why you would stay engaged in this process. When I look at what's happening under the FERC process and what our local districts are presenting to you in terms of sound science, multi-pronged approaches to resolve real issues in the Delta using real science and their oversight with federal government agencies, what -- the tools you have in your toolbox, as the gentleman just communicated, are blunt and inadequate and you're likely, in the process of only controlling flows and not looking at any of the other measures being addressed in your FERC process that are much more effective and much less costly to our community, why you don't back up, stand aside, and let that go forward for a couple of years and let our community use its local resources, \$24,000,000 spent already, to come up with our own plan and see if it's not far superior to the 1,100 fish that you'll save with your plan at a cost of -- if it's a \$62,000,000 economic impact, it's going to be \$56,000 a fish. If it's a billion-dollar impact or more, it's going to be a million dollars of fish. I think we can do better locally.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
937	2	There's a pretense that has been attacked several times today, that this water will go to the Delta and then to Los Angeles. I'll read you from the California Section of the new Water Quality Investment Act from the federal government, just passed recently, a -- just a moment here. A quote that says exactly that, "Adopt a one-to-one inflow to export ratio for the increment of increased flow as measured as a three-day running average at Vernalis during the period from April 1st to May 31st." So, the new Water Quality Investment Act, to me, now maybe we need to let the agencies get ahold of it and run it around, do their implementation for a few years while you let our districts come up with a better plan that you have any chance at because you've only got one tool and they've got many. I don't understand why you would go forward with your process with these facts hanging out there. You may not have the federal authority on your side, and we may have a better solution locally, and there are many more tools than what you even have authority over.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
938	1	With your plan, we are going to be depleting the storage we already have. And I hope that you really listen to this group here, and work with them. And there's other solutions than just 40 percent.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
938	2	Because most of my clientele was on the west side of Stanislaus County, the feds cut back their water. It didn't make it viable for my clientele to grow fish -- to grow hay anymore, so, this year, we closed the doors on our operation, our hay-making operation. Four of my employees, who had families in those 17 years, are not going to have jobs with me. I'm going to keep two because I still farm here west side of Modesto, but that's the devastation that this water creates for our economy. It's happening in my ranch already. So, and I'll feel real bad for them.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
939	1	Several people brought up the twin tunnels and the obvious effect on the Delta salinity and the Bay Health. In fact, you've taken umbrage at the idea that this Phase I exercise is about replacing Delta water that would be siphoned off through those tunnels. If Stanislaus, Tuolumne and Merced water is not needed to replace Sacramento River water currently going into the Delta, why not start out with those tunnels? Build those tunnels now.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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939	2	Build additional water storage, as the California voters have authorized.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
939	3	Construct some desalination plants on the coast and for Southern California. Deal with the predator fish. Accomplish these things before turning Central Valley into a desert. You need to re-evaluate your phase sequence.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
940	1	<p>I have been able to understand the frustration of the growers I represent on a very real and personal level, that "this is my drinking water, his is my ability to water my lawn. This effects my neighbors. This effects us all."</p> <p>I strongly urge you to work more closely with the districts. Find better solutions so that we can keep our community and keep that feeling of home for all of us who live here.</p>	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
941	1	<p>There are several large businesses in Salida who are dependent on our surrounding agricultural community, including Holt of California, Flory Industries and Blue Diamond Almond. Odds are, if you've eaten fruits, nuts, vegetables, beef, and drank milk or wine, you've been nourished by foods produced in Stanislaus County.</p> <p>There are no corporate farms surrounding Salida, just small family farms and dairies which, in some cases, have been in the same pioneering farm families for over 100 years. On the northern-most border of Salida is the Stanislaus River, which combined with the Hanford sandy loam soil makes this part of the county especially fertile and a prime area for aquifer recharge.</p> <p>Our local farmers have been good stewards, conserving water through these tough drought years. Needless to say, depleting their water supply any further will cause a domino effect which will cause a domino effect which will topple business and commerce in our region, and for what?</p>	Please see Master Response 1.1, General Comments, for responses to comments that make a general comment regarding the plan amendments and general information regarding the economic analysis. Please see Master Response 3.5, Agricultural Resources, for discussion of the potential effects on dairies and livestock operations. Also, please see Master Response 8.2, Regional Agricultural Economic Effects, for discussion of the economic effects on dairies and food processors.
941	2	<p>It's not about the salmon. I think the salmon are just a straw man for the real reason to demand more water. It's no coincidence that the amount being demanded is the same as what's needed to offset the water from the Sacramento River to ship south. If it were about the salmon the state would first implement measures, like banning the commercial fishing of salmon, which has not been done since 2009, or dredging the rivers, but you're not doing these things. If it's not about the tunnels, then why not just have one tunnel instead of two. But instead, the state is going to do what it wants to anyway.</p> <p>But you need to remember that for every action there's a reaction. Our local irrigation districts have already given notice of what that reaction will be if the state moves forward on this water grab. Their slogan, it's worth your fight, and fight we will. But it won't be a fight with farmers' pitchforks, it will be with lawyers.</p> <p>The resilient residents of the Central Valley are in this fight for our lives. So perhaps reconsider the compromise you were already offered.</p>	<p>Please see Master Response 1.1, General Comments, for information related to the California WaterFix.</p> <p>Please refer to Appendix C, Technical Report on the Scientific Basis for Alternative San Joaquin River Flow and Southern Delta Salinity Objectives for information regarding the benefits to fish.</p>
942	1	I wanted to just bring to light two different scenarios in Appendix G of the SED, looking at the ag impact directly related to almonds. So, Appendix G, there is analysis that says anywhere between 151 acres to 529 acres to 1,588 acres could be lost under the three different alternatives. What exactly this means is really vague. Is it lost production, lost productivity, or something else? But let's assume that these figures are correct, even though	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		<p>they have been disputed by different water districts and different counties. With capital investments of \$25,000 per acre for almonds to get their orchards in place and then go without income for several years, if you look at the number 3 Alternative of 1588 acres, that's an impact of \$39,000,000 alone to the almond industry. Additionally, there will be lost net income, land values, and other economic multipliers in play.</p> <p>Another statistic in the SED, Appendix G, is the acreage assessments for MID and TID. They're based on 2009, and 1991 to 2011 data respectfully. Given the increase in acres of tree crops over the last ten years, more current data should be used. We [Almond Alliance of California] estimate that there's a difference of 1,350 acres alone in those two irrigation districts.</p> <p>And then, lastly, the report does not provide the data used to determine the crop price. So, if you are looking at crop prices from the 1990s, then you are grossly underestimating the value of our crop. So, given these concerns just with two irrigation districts, one crop, I think that there's a lot of review that needs to happen on the economic analysis so that you guys can make well informed decisions.</p>	
943	1	<p>The fish versus farmers, what a false choice that is. We can't think of rivers in utilitarian -- for utilitarian purposes. Water is life. It sustains us. We need to care for our rivers so that they continue to sustain us.</p> <p>Our local rivers are degraded and hurting. There's just not enough water. There's too many demands, too many diversions, too many almond trees. I do sympathize greatly with those hurt by the drought, the lack of water, and the farmers who have spoken. It's a tough decision you face. And we all face together. Just the current path we're on, though, is not sustainable, due partly to poor decision-making in the past.</p> <p>I think the best course of action is to follow dispassionate science and the experts and do what's best to heal our rivers. And from that, develop a comprehensive and balanced solution going forward, and plan for the future accordingly involving sacrifice from all sides.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
944	1	<p>Your proposed plan under the SED impacts the Eastside Water District drastically and the entire Turlock Subbasin. Your staff has not an accounted for the groundwater pumping occurring throughout the lower San Joaquin Valley outside of its existing water district boundaries.</p> <p>Eastside Water District is in the process of annexing nearly 9,000 acres of such land. And it understands how not accounting for this use can affect your staff's estimates on impacts to the Turlock Subbasin.</p>	<p>The State Water Board appreciates the time and resources the District and local landowners have committed to achieve groundwater sustainability under SGMA.</p> <p>The State Water Board acknowledges it will be challenging, but SGMA compliance cannot occur at the expense of reasonably protecting surface water beneficial uses; both groundwater and surface water must be protected. Implementation of the plan amendments would not prevent sustainability of the Turlock subbasin. Rather, comprehensively addressing surface water and groundwater allows for integrated planning of scarce water resources that does not trade impacts between surface water and groundwater. It will be up to local entities to determine the precise actions that would be taken in response to implementation of the plan amendments, with or without the future condition of SGMA. For further discussion on this issue, please see Master Response 3.4, Groundwater Resources and the Sustainable Groundwater Management Act.</p> <p>The SED groundwater analysis was based on appropriate assumptions and the best available information in accordance with CEQA. For a discussion of the baseline conditions adopted for the SED, please see Master Response 2.5, Baseline and No project.</p>
944	2	<p>The Eastside Water District landowners have committed their own money, \$9 million, in capital projects and over \$900,000 a year in an operational budget to achieve groundwater</p>	<p>Please see response to Comment 944-1.</p>

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		<p>sustainability under SGMA.</p> <p>Your proposed actions on unimpaired flows and operational controls on storage significantly reduce, if not eliminate, all potential for the Eastside Water District water supply. Without this water, achieving sustainability for the Turlock Subbasin is not possible.</p> <p>I implore you, and the district implores you, that these impacts are avoidable if you indeed do stop, regroup, tackle the water quality issues planned when you have all of the pieces of this puzzle.</p>	
945	1	<p>The proposal most impacts, as you know, San Joaquin, Stanislaus, and Merced counties. There are over a million people that live in those three counties alone. And if you add the people affected to the east of us, much less the people in San Francisco, the number is double.</p> <p>Our community is diverse. We have a lot of different industries. But there's no denying the fact that the bread and butter of our economy continues to be agriculture and food processing. I am not a farmer, but as a lifelong resident of Stanislaus County, I have certainly benefitted from the agricultural industry, as does everyone who lives here, either directly or indirectly. It is central to our hopes for the present and the future in terms of jobs and economic development.</p> <p>We're a very low-income area. Stanislaus County and the Central Valley Region is not the Bay Area. It's not the Silicon Valley. It's not the California Coast. And it's certainly not the thriving centers of commerce in San Diego and parts of Los Angeles. But we make do. We invest in our own community because we've learned that we cannot rely on the state and we cannot rely on others to do it for us, so we've been responsible investing in our own community. But I will tell you, we cannot survive if the state makes our own condition, our current conditions worse. ...</p> <p>The one plus we have in our community is water, and we can't have you take that away from us. Your Board staff is recommending action that would significantly and unavoidably, in your staff's own words, make our situation much worse. Taking this water would devastate an already struggling region. Water is what gives us hope for the future.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that make a general comment regarding the plan amendments and general information regarding the economic analysis.</p> <p>Please see Master Response 2.7, Disadvantaged Communities, regarding effects related to disadvantaged communities.</p>
945	2	<p>This proposal will make our ability to provide solutions to improve our drinking water far worse.</p>	<p>Please refer to Master Response 1.1, General Comments, regarding purpose of the plan amendments, the consideration of beneficial uses by the State Water Board, and the programmatic nature of the SED.</p> <p>Please refer to Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act, for a discussion regarding the groundwater resource impact analyses and how SGMA will protect groundwater basins from overdraft to ensure a reliable water supply.</p> <p>Please refer Master Response 3.6, Service Providers, regarding the potential impacts of the plan amendments on service providers' ability to provide safe and reliable water.</p>
945	3	<p>At this point, so far, the Board's proposals have ruled out mitigation. How can that be? Our area has stepped up to the plate many times in statewide efforts, the 2014 Water Bond, conservation mandates that we met, Measure L most recently. We built our own water project systems decades ago to prepare for our future. We regularly invest in our future.</p>	<p>Please see Master Response 1.1, General Comments, for a discussion of mitigation under CEQA and the State Water Board's authority to require mitigation measures.</p> <p>Please also see Master Response 1.1 and Master Response 2.1, Amendments to the Water Quality Control</p>

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		And we are willing to step up now and negotiate settlements, but we can't do it alone. We need you to work with us.	Plan, for responses to comments that discuss the State Water Board's support of voluntary agreements.
945	4	When negotiating a Water Bond several years ago, Assembly Member Gray and I brought up the flow proposal with Governor Brown. The Governor told us that any proposal would be reasonable and well vetted, but this Plan is neither. It is certainly not reasonable, and it certainly has not been well vetted. But today is a step in that direction and we appreciate that. There's been no mitigation, nothing for schools, cities, agriculture, jobs, economic dislocation, nothing for our future, except more poverty and less hope.	<p>The plan amendments are based on nearly eight years of study and analysis. The SED was prepared to support the plan amendments, and included a sufficient degree of analysis to inform the decision-makers about the environmental consequences of its decision and what is reasonably feasible in light of the magnitude of the plan amendments and its geographic scope. Please see Master Response 1.1, General Comments, regarding the adequacy of the approach to analyses as well as responses to common general comments regarding the resources analyzed.</p> <p>The SED provides several summaries regarding significant and unavoidable impact determinations after incorporation of mitigation and mitigation measures. Please see Master Response 1.1, General Comments, regarding mitigation measures, and for a complete listing of summary locations in the SED.</p>
945	5	The Board has admitted in hearings that the modeling on the fishery impacts in the proposal is flawed, that there are other scientific bases that are flawed, ...	Please see Master Response 1.1, General Comments, for responses to comments regarding the scientific basis of the SED. The State Water Board used the best available science throughout the SED. A variety of data were obtained for the water quality planning process: quantitative data from peer-reviewed published literature on topics specific to the plan area; peer-reviewed published literature on areas outside the plan area but on topics relevant to the plan amendments; unpublished quantitative data from within the plan area and from outside of the plan area; qualitative data or personal communication with topical experts; and expert opinion if no other sources were available. In addition, the State Water Board reviewed, and incorporated where appropriate, FERC re-licensing studies into Chapter 19, Analyses of Benefits to Native Fish Populations from Increased Flow between February 1 and June 30. Please see Master Response 3.1, Fish Protection, for responses to comments regarding modeling of fisheries impacts and the basis of science used in the analysis.
945	6	We all want better fisheries. We want a healthy Delta, and we can achieve that better and more holistically if we work together.	Please see Master Response 1.1, General Comments, regarding the public outreach process and voluntary agreements.
946	1	We have an opportunity right now, via this Board, a once-in-a-lifetime opportunity to leave for our children and their children a thriving river here in our Central Valley, three thriving rivers. We, as a community, not just Central Valley, not just Stanislaus, not just Modesto, not just this water basin, but all of California and this world, we have a responsibility to protect and steward our rivers, specifically these three rivers. And that is why I want to thank this Board for their plan and their efforts and their work about how to protect the Bay-Delta and its tributaries.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
947	1	I have a whitewater rafting business and I've been boating on the Stanislaus and Tuolumne and Merced rivers for the last 45 years. I thoroughly appreciate the farmers that have provided my family and I with food. I like fish, but I think that the water resources of California have been way overcommitted. We have a severe difference in who gets water, at what price and at what commitment. And today people -- some farmers have, in order to not lose it, they have used it unwisely. And I think the struggle between the farmers on the east side of the valley have been compromised by the farmers on the west side of the valley, and it's the struggle between East and West, the canals that service those farms from water from the north. You know, we have a potential four-way civil war over water. And you're sitting in the middle.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
947	2	I love the environment. I don't think it has necessarily been unwisely used over the last few hundred years, but there are some inequities. And if we're subsidizing water, growing food	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		<p>and sending it to other countries, then these exports are being financed by our tax dollars, and I don't think that's entirely fair. We should not be competing. I should not be having to pay more because the food's resources are being sold at a higher price elsewhere, outside of the country. So I think we should -- the conservation measures that could be taking place to replace flood irrigation with drip irrigation, perhaps those should be paid for by the large corporate farmers that are being subsidized with big reservoirs and canals and whatnot. I'd like to see a tax on exporting these commodities.</p>	
948	1	<p>I got firsthand experience on predation of the fish and what happened there. It's like paying with cash for something, you know, instead of whipping out your card, you pay cash money, it leaves your hands. When you see that impact of that fish and what was happening, it hits home. So being boots on the ground, in the trenches seeing what's going on firsthand, farming here peaches, walnuts, and almonds my whole life over, you know, 300 acres with my family, raising beef cattle, seeing the impacts that this proposes, and what it impacts on here, having a document that's 15-inches tall, that's 3,500 pages, that took you guys years to prepare, you need to listen to the education of the people here that are educated in this. Take the time to listen to them and educate yourselves from them also.</p> <p>So, you have the time. Don't rush through this process. Take your time. If it takes longer, let it take longer. But take your time and study the facts and make your decision wisely off of that.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
949	1	<p>I want to applaud the Board and staff for its efforts to put forth a plan to both revive the San Francisco Bay-Delta and improve the health of the San Joaquin River and its tributaries, including the Tuolumne River.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
949	2	<p>The services the river provides come at a cost, and that we have a responsibility to make sure that those costs do not jeopardize the health of the resource.</p> <p>Unfortunately, many of the past and current Tuolumne River water users have ignored the costs of our actions. And now we are faced with a harsh wakeup call, an entire river ecosystem that is close to collapse.</p> <p>There's been a lot of finger pointing, denial and cries of foul play. Who is really to blame? I tell the students that if you turn on a light, open a faucet or flush the toilet, you're to blame. We all are part of the problem. Solutions are not going to be easy, requiring tough decisions and big sacrifices from all of us because, regardless of other actions, we must find ways to leave more water in the system.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
949	3	<p>The Tuolumne River Trust has been working for over 30 years with a diverse group of stakeholders on issues affecting the Tuolumne River. We know the river and the communities it flows through. And we are confident that by working closely with our fellow Tuolumne River water users, we can come up with effective actions that will help to reestablish that delicate balance between the needs of people and the needs of the environment.</p> <p>At a minimum, this proposed plan has brought everyone to the table, and that's a good first step. We look forward to being part of the conversation.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
950	1	<p>You've already heard lots of opposition to higher flows in the Merced, the Stanislaus and Tuolumne rivers. Well organized interests have rallied their supporters. Water districts have</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general</p>

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		<p>given lengthy presentations, making claims that agriculture will be devastated and that storage reservoirs might go dry one in seven years. These presentations and model runs are based on those districts careful choice of modeling assumptions that best portray their arguments and their opposition to the proposed plan. No matter what amount of increased water flows the Board proposes for the three rivers, those who profit from water diversions will denounce this Plan. That is to be expected. And it is also to be expected that water districts, agricultural interests and politicians will point to claims made by paid consultants as grounds for disregarding the conclusions made by government agency scientists in the SED.</p> <p>Like me, everyone who shows up to testify brings their bias, especially those who stand to profit if less water is left in the river. They have an economic reason, in addition to their philosophic positions. However, the most neutral, most professional source of model runs and scientific determinations are the agency scientists who have informed the SED.</p>	<p>comment on the plan amendments or do not raise significant environmental issues.</p>
950	2	<p>What has been allowed for these rivers up until now over so many years is clearly not adequate. We are past the time when the Board can accept rosy scenarios of salmon populations rebounding just because predators or targeted or because more gravel will be placed in streams for spawning. Increased flows are pivotal for cooler water temperatures, increased escapement and reduction in invasive weeds.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
950	3	<p>The Water Board has a legal obligation to comply with federal and state mandates. The Board is also aware that legal mandates require state action to reduce salinity and to restore at-risk resources in the Delta, actions also tied to increasing flows.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
950	4	<p>I urge you, the representatives of water resources in our state, to stand up to the pressure and either adopt Alternative 4 or, at the very least, adopt Alternative 3, a balanced compromised plan with its beginning point of 40 unimpaired flow left in the three rivers.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
951	1	<p>No water, no vegetable or fruit, no farmworkers, no harvest, no food. So, that mean we are people that work in the fields. You're not -- almost nobody, very few people maybe, speak regard to the farmworkers. But without the farmworkers, no food.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
951	2	<p>please revise your proposal. A better water. We need the water to survive. And, please, compared to what happened in L.A., in San Diego, they consume more water than our area. So, it's very contradicted.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
952	1	<p>Here in California, we've had five years of drought, we're going into our sixth year of drought in the Central Valley. This year a report came out on October 27th from the California Department of Food and Agriculture. It tells us that since June 1st of last year another 77,000 acres of almonds, new almond orchards, were planted. If we don't have enough water for existing crops, is it wise to be planting more acres of almonds?</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
952	2	<p>This resource of water is needed for everyone in the Valley. It's needed by the people living in the cities. It's needed by the farmers living on the farms. And it's needed by the fish that live in the rivers.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
953	1	<p>Stanislaus County is a viable, vibrant community that not only feeds ourselves but feeds many people around the country and around the world. Without agriculture, we cannot provide a safe, reliable, domestic food supply. That should be a national security issue for</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>everyone here in this room, not just those of us that are involved in ag, but everyone else. Every time we go to the grocery store, we choose if we want American-grown food. And I don't want to feed my family or my grandchildren food grown in a third-world country, which is what you're driving us to do.</p>	
953	2	<p>I really plead with you to look at the solutions that have been brought today. Let TID, MID, OID, let's go back and let's revisit, let's have a conversation. They know the water. They know the rivers. They've done so much studies. We need to put it in their, the Irrigation District's hands and not be dictated by Sacramento or anyone else.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
954	1	<p>Something that I appreciate the panel addressed is water management and water use efficiency. And I hope that the Board could really take a closer look at that moving forward.</p> <p>I think there are some opportunities out there to use our water more efficiently and more wisely so that there's more to go around, and let me give you a couple of examples. Let's consider the Don Pedro Flood Management Manual. It's a manual that hasn't been updated since it was written by the Corps of Engineers in 1972, so 45 years old. The plan you're looking at is now about 21 years old.</p> <p>Conditions have changed. Forecasting has gotten better, although some might beg to differ on that. We do know the system better. And on-the-ground conditions have changed. Bridges have been removed and replaced with wider spaced piers. So basically, the river is able to convey more water more quickly. And why that's important is the Don Pedro Flood Management Manual requires a certain amount of storage be set aside for flood management in the winter and spring. If we take a closer look at that we can maybe tighten things up and create more storage that can be used later on. And so that's one opportunity.</p> <p>A second example is the Dry Creek that flows into the Tuolumne River. It's a small, unregulated stream that has pretty flashy hydrology. There's an opportunity to potentially create a flood detention basin on Dry Creek that would help recharge groundwater throughout the region, possibly 20,000 to 30,000 acre-feet of supply.</p> <p>One last example comes from the South San Joaquin Irrigation District where they've run a pilot project on 3,800 acres of their district. And through that project they converted a delivery system to a pressurized system. And what I've read is that they've reduced water use by 30 percent while increasing production by 30 percent, so another huge improvement.</p> <p>So I would encourage the Board to take a look at these solutions. I think we can spread our water around a little bit further and use it more wisely.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
954	2	<p>MS. D'ADAMO: I have a question.</p> <p>CHAIR MARCUS: Oh.</p> <p>MS. D'ADAMO: Patrick?</p> <p>CHAIR MARCUS: Go ahead.</p> <p>MS. D'ADAMO: You and I have talked several times about the Tuolumne River, in particular, and some of the opportunities there for habitat restoration projects. So if you could just</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>take a few seconds to share your thoughts on that.</p> <p>MR. KOEPELE: Certainly, we need to look at not only the full range of water management solutions but the full range of habitat and wildlife and fisheries' improvement opportunities. And so one thing that we've been involved with is floodplain restoration. We know that floodplains are really key to salmon survival. And there are a lot of opportunities. We've been engaged in restoring some of this land along the river so that fish have access to it. There's much better survival rates. We need to do more of that on a pretty big scale.</p> <p>I did hear in some hearings, the Sacramento hearing, an estimate of \$500,000 an acre. I think that's pretty high. From my experience, I would think you'd bring that down, maybe \$50,000 an acre. Still pretty expensive, no doubt, but much more achievable. So a combination of, you know, you've got bring a full range of tools to the problem here, both on the water supply and habitat, and I think that that could happen.</p>	
955	1	<p>My problem is with the process itself, because it just does not seem to provide for adequate solutions. And I'll use that 25 percent declared reduction in use that the Governor put in place that everybody jumped onboard with, an enormous amount of money was spent on, and a lot of people killed their lawns and took five-minute showers for a savings of two-and-a-half percent supply. That's all we got out of that, which is negligible with respect to what this state needs.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that do either make a general comment on the plan amendments or do not raise a significant environmental issue.</p>
955	2	<p>The fact of the matter is, is that on the balance sheet this state is bankrupt with respect to water. If you believe in the climate change that's being propagated, you know that there's not going to be the amount of snow that is what has kept us alive, which is cash flow. So therefore, if adequate surface storage is not built, which is where the effort needs to be, this is not going to work. What you're proposing isn't going to work. It's going to sacrifice this valley to accomplish some short-term goals, and then we're going to be out of the water that we say that we need.</p> <p>If you've actually heard the people that you've met with the last three times and you see this group here in this room, you realize you have to start over. This isn't going to work. What you're proposing is not going to accomplish your goals and it's going to destroy our economy. Table for a moment that you're in this unelected and unaccountable position to this people in this room. The elected officials are but you guys are not, and it puts you in a position to ignore a lot that maybe you shouldn't.</p>	<p>Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please also see Master Response 1.1 acknowledging the concerns of elected representatives and community members and information regarding improving or developing infrastructure. Please see Master Response 3.2, Surface Water Analyses and Modeling, regarding climate change, as well as Impact EG-5, Effect of climate change on the LSJR and SDWQ alternatives, in Chapter 14, Energy and Greenhouse Gases. Please see Master Response 3.1, Fish Protection, regarding the scientific justification for the plan amendments.</p>
956	1	<p>Our family farm is along the banks of the Stanislaus and Tuolumne Rivers. Our operation is a global gap certified sustainable operation. That means we can tell our customers that we're doing everything possible to ensure that our farm will be in business 100 years from now. So here's my concern, that despite scientific data that shows the validity of alternative approaches, the SED has blindly held on to the notion that spring unimpaired flow approach is the only management vehicle to address fish and wildlife, beneficial uses and salinity control. This current recommendation of the SED will have a devastating effect on my farm and our community. It will result in increased pumping of groundwater, the degradation of drinking water. And long term, I'm concerned that the SED means that our farm will no longer be sustainable.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
956	2	<p>So the decision before your Board is to either hold on to the monkey mentality and blindly just support the SED as it's written and spend years and millions of dollars defending the</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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		<p>SED, or have leadership to constructively work with stakeholders to find a solution.</p> <p>And let me suggest that the best way to do it is, it's in everyone's best interest, to pursue a framework of mediation for a global settlement. That's based upon science. And it would include functional flows, not unimpaired flows, dry year relief, non-flow measures such as predation, aquatic re-control habitat restoration, additional storage, integration of technology into our aging irrigation systems, multi-species management, and recognition of our region's reliance on groundwater.</p>	
957	1	<p>I took over farming in 2012 right in the driest periods that we'd ever seen since 1977. I've learned the value of having a water supply. Since my crops dropped by 20 to 40 percent when the allocatements (sic) were curtailed down to even only 16 inches. We're still coming back from that. And in order to achieve suitable crops, you know, I need about 60 inches of water to be able to do that. So, if this proposal was passed two years ago, I would have received zero water. That means I'm a large/small farmer. I farm over 200 acres. I don't own more than 20. And those are spread across 14 different ranches, so there's 14 different, 10-, 28-, 30-acre ranches that I farm. And when they cut us back down to 16 inches, it was hard. Like I said, our crops went down by 20 to 40 percent because they're all permanent crops in almonds.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
957	2	<p>The very water rights that my family, the Blickenstaffs, the Millers, the Dunlaps, the Vermeulens, we all gave up land to allow these canal systems to bring water to this parched valley. And that's something that we hold dear, all the land that we've worked hard to maintain. I beg that you keep in mind our future.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
958	1	<p>The issue we have here is that for the first time in history we have, at least in California history, we have a new definition for the term waterboarding. It used to be trickling water over someone's blindfolded body under the illusion that they would be drowning in a flood. Now water is being trickled down upon us and we're supposed to think it's a flood and try to sustain our farming communities, and we just can't do it with what's been proposed.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
958	2	<p>We have a meeting hosted for the first time by the thief that's stealing 40 percent of our water, water that we have rights to. And every Californian farming here and every person that drinks a glass of water has rights to that water, and then it's now being taken away. So my message today isn't to the Water Board, it's to MID, it's to TID, it's to OID, it's to Merced County Supervisors, Stanislaus County Supervisors, today unite your funds and force us to fight what's been proposed. There is no win here. There is no negotiation. Who barter with a thief for how much they're going to allow them to steal from them?</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
958	3	<p>A lot of this we all know is a water grab. Water is going down, diverted to L.A. Water has been twin tunneled. It's unbelievable what's being proposed here. It's time to fight. Not a penny towards negotiation, because they're not going to. Not a penny to tribute. This is about our water. We're not giving it up.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>
959	1	<p>I was stunned by the 3,500-page document that you mentioned. And I don't think I could even pick it up and carry it here. You've heard a lot about economic impacts and all that sort of thing. I would be curious what that thing cost to develop. Maybe you could enlighten some of us here to tell us what that document cost us. We're taxpayers. It would be nice to know.</p>	<p>Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.</p>

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959	2	I was a little bit surprised by the comment from one of the councilmen from the City of Modesto that said that he had approached you [Chair Marcus] to try to talk to you with -- to get some kind of response and negotiations, and it appeared to me that you were not aware that he had talked to the staff and he couldn't get anything out of the staff.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
959	3	We're under a state order to reduce our water use. Well, this proposal is to significantly increase the river flow straight to the ocean. That doesn't make any sense. You know, you talk common sense, it doesn't make sense to me. You're talking about pumping groundwater to replace surface water, and we have problems doing both. That really doesn't make an awful lot of sense. Changing the cropping patterns is absurd, that just doesn't make sense at all. And the economic impacts that you heard today that you have developed don't seem to coincide with what happened.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
959	4	Over my 35 years as a farm advisor I went to an awful lot of public hearings and I went to a lot of places where people like you and your staff come out to the various communities, you listen to the comments, you go back to wherever you came from, and sometimes you put them away in a file, and just feel good about making the effort to come down and talk to people. I'm hopeful that this time that you guys will go beyond that. Because I think it really needs to happen.	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
959	5	Your proposal is not only a bad idea, it borders on stupidity, is myopic and one-sided (TUNNEL VISION). We are under a state order to reduce our use of water while you propose to significantly increase the flow of our rivers out to sea. Our forefathers had the foresight to build, and pay for, dams to control the floods that today, if unchecked, would flood the lower elevations. Today these dams also generate power and provide water for agriculture and domestic use. That vision has resulted in the development of a multi-billion dollar economy and a very comfortable quality of life for our tax-paying citizens...the same people who pay for your office space, car and salary!	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
959	6	I spent a large part of my 35 year professional career assisting the agricultural community comply with bureaucratic regulations while maintaining economically viable production of many of the items you place on your table each day. I have attended hearings where elitist anonymous bureaucrats who don't live in our community spend a day hearing our concerns, then go back to their insulated cubicles, file away the comments and feel good about their effort. Unfortunately they are never really held accountable to those who have to live with these unrealistic proposals! I watched incredulously, while "feel good", unscientific testimony received equal weight to sound science based information and common sense in hearings like this one. I would like to think that today you are better than that and recognize that there are serious, negative, ramifications of this faulty proposal, and you go back to the drawing board and find alternatives!	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
959	7	We have carefully managed our water while other parts of the state make no effort to capture the rain that falls on their watershed, let alone conserve. Many years ago we were required to install flow restrictors on all faucets/shower heads in our homes and businesses. We complied, but I didn't see that same cooperation by our thirsty southern neighbors! When traveling, the showers in hotels I stayed in Southern California amazingly were unrestricted. It seems they still don't get it down there, so it might be more effective if you focused your efforts further south, where they don't seem to understand water conservation, rather they waste it by providing concrete lined rivers directly to the ocean!	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		Or do they have TUNNEL VISION?	
959	8	Biological systems are resilient and adaptive. I believe in evolution and survival of the fittest, and can't comprehend using the pretext of placing 1100 hatchery fish above people in your priority rankings. What foolishness! You should be ashamed! Or is this just a water grab with TUNNEL VISION?	Please see Master Response 1.1, General Comments for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.