



Stanislaus County Farm Bureau

Ron Peterson
President

Wayne Zipser
Executive Manager

1201 L Street
Modesto, CA 95354
Phone: (209) 522-7278
Fax: (209) 521-9938

Info@stanfarmbureau.org

*Serving
Agriculture
Since
1914*

March 28, 2013

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814-0100



RE: Supplemental Environmental Draft - *Unimpaired Flows* proposals – San Joaquin, Stanislaus & Tuolumne Rivers

Dear Ms. Townsend,

The Stanislaus County Farm Bureau is a non-profit, grassroots membership organization of approximately 3,400 members. We work on behalf of the farmers and ranchers in Stanislaus County. Our local board is made up of 37 members representing 5 regions in our county. Those 37 members make up a wide range of crop diversity and experience.

At our March 6, 2013 Board of Directors meeting, a resolution was passed unanimously to oppose the State Water Resources Control Board (SWRCB) proposal of 35% unimpaired flow for the Tuolumne, Stanislaus and San Joaquin Rivers.

Stanislaus County agriculture is blessed and consistently ranks in the Top 10 nationally for farmgate revenue. That blessing on our farmers and ranchers is spread to our entire county. For example – the farmgate revenue of \$3 billion is multiplied 3.5 to 4 times in our community – an estimated \$10.5 billion to \$12 billion of commerce. Stanislaus County farmers export more than 90 different commodities to nearly 100 different countries around the world.

The current “unimpaired flows” proposal of releasing additional storage water from New Melones Dam (Stanislaus River) and Don Pedro Dam (Tuolumne River) could be extremely harmful not only to the farm community of our county, but to the general socioeconomic wellbeing of our county. While the FERC relicensing process is complete on the Stanislaus River, it is in the early stages on the Tuolumne River. Additional flow requirements are expected from the FERC process, thus compounding any requirements created by an “unimpaired flows” proposal.

Here are a few “significant and unavoidable impacts” for the State Board to think about. The following statistics are from our recent State of the County address by our Board of Supervisors Chairman, the Honorable Vito Chiesa:

- *“There are more than 35,000 people out of work in our County, which is the equivalent of the entire labor force of the cities of Turlock and Patterson combined.”*
- *“...our top ten major manufacturing employers in Stanislaus County – including E&J Gallo Winery, Frito Lay, Seneca Foods, Del Monte, ConAgra, etc. - our top ten manufacturing companies employ approximately 14,000 people.”*
 - These are all food processors that not only depend on local farmers but also depend on local energy sources.
- *“Our land values are based on water and we need to do all we can to protect it.”*
 - Land values are instrumental in property taxes which drive the county general fund.

Our Board of Directors finds it patently unfair that the entire proposal is placed upon the backs of our local irrigation districts and that the City & County of San Francisco and more junior water rights holders in the basin are exempted from any flow obligation in connection with their own facilities.

If the SWRCB will create “significant and unavoidable impacts”, then it should not place the entire burden on a single region. The already struggling disadvantaged communities in our area do not need or deserve to be handicapped still further. The SWRCB will ensure that they are by affirming this proposal.

Thank you for your time and consideration and I look forward to your response.

Sincerely,

Ron Peterson

Ron Peterson
President

CC: The Honorable Tom Berryhill, Senate District 14
The Honorable Anthony Cannella, Senate District 12
The Honorable Cathleen Galgiani, Senate District 5
The Honorable Adam Gray, Assembly District 21
The Honorable Kristin Olsen, Assembly District 12
Modesto Irrigation District
Oakdale Irrigation District
Turlock Irrigation District



Stanislaus County Farm Bureau

Ron Peterson
President

Wayne Zipser
Executive Manager

1201 L Street
Modesto, CA 95354
Phone: (209) 522-7278
Fax: (209) 521-9938
Info@stanfarmbureau.org

Serving
Agriculture
Since
1914

RESOLUTION

Whereas, the State Water Resources Control Board's Draft Substitute Environmental Document (SED) proposes to require the Stanislaus, Tuolumne, and Merced Rivers release 35 percent of unimpaired flow from February to June each year; and

Whereas, the proposed requirement will create "significant and unavoidable" impacts to the economy, agriculture, and groundwater basins in Stanislaus, San Joaquin, and Merced Counties; and

Whereas, those impacts include approximately \$69 million in economic impacts in an economically distressed region of our state, including \$23.5 million to Merced Irrigation District, \$30 million to Turlock Irrigation District, and \$15.5 million to Modesto Irrigation District each year; and

Whereas, the impacts result in a loss of \$4.5 million in energy revenue every year including \$1.5 million to each of the Merced, Turlock, and Modesto Irrigation Districts; and

Whereas, the proposed requirement would fallow approximately 128,295 acres of prime farm land and result in the loss of over 800 family farms in the region; and

Whereas, the proposed requirement will result in over-drafted groundwater basins; and

Whereas, approximately 460 jobs will be permanently lost including 160 in Merced Irrigation District, 200 in Turlock Irrigation District, and 100 in Modesto Irrigation District; and

Whereas, the proposed requirement will not benefit native fish populations or promote ecosystem restoration; and

Whereas, the proposed requirement ignores non-flow alternatives that are less costly and more effective; and

Whereas, the proposed requirement compromises attaining the dual goals of ecosystem restoration and water supply reliability under SB7x-7.

BE IT THEREFORE RESOLVED that the State Water Resources Control Board should pursue a comprehensive solution that is consistent with the timing of the overall comprehensive Delta planning process and which takes into account the potential impact on hydroelectric energy generation. This solution must prioritize non-flow measures to protect native fish species, such as predation reduction programs, before demanding flow increases that would threaten the economic vitality of these California counties, cities, and small family farms.

Ron Peterson

Ron Peterson
President

March 26, 2013