



Consisting of 240,000 acres on the Westside of the San Joaquin Valley

March 20, 2013



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California Water Boards  
State Water Resources Control Board  
Charles R. Hoppin  
Chairman  
1001 I Street  
Sacramento, CA 95814

RE: ***Policy Statement of the San Joaquin River Exchange Contractors  
Water Authority***

Dear Chairman Hoppin:

The San Joaquin River Exchange Contractors Water Authority (Exchange Contractors) appreciates the opportunity to provide comments on the SWRCB's SED regarding the Unimpaired Flows for the Lower San Joaquin River.

The San Joaquin River Exchange Contractors Water Authority is a Joint Exercise of Powers organization that represents the Central California Irrigation District, San Luis Canal Company, Firebaugh Canal Water District and the Columbia Canal Company which serves irrigation water to approximately 240,000 acres of land on the West and East sides of the San Joaquin River from Mendota in the South to Crows Landing in the North. Much of the Authority's members lands have been irrigated for more than 120 years.

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 for unquantifiable fishery enhancements, yet the proposed requirement will create "**significant and unavoidable**" impacts to the State's economy, agriculture, and groundwater basins in the San Joaquin Valley.

Those impacts include approximately \$70 million in annual economic impacts in a distressed region of our state. It will require the fallowing of approximately 125,000 acres of prime farm land and will result in over-drafted groundwater basins. This over-drafting will exacerbate the current land subsidence issues in Merced County, thereby increasing impacts to public safety, flood conveyance channels and water supply infrastructure as already discovered by the State of California's Flood Safe Program in conjunction with the San Joaquin River Restoration Program. Please see the current subsidence data shown in (Attachment 1).

Charles R. Hoppin, Chairman

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We recommend that the State Water Resources Control Board pursue a comprehensive solution that is consistent with the timing of the overall comprehensive Delta planning process before demanding flow increases that would threaten the economic vitality of these California counties, cities, and small family farms as well as causing impacts to local public works facilities.

We fully support the comments of the San Joaquin River Tributaries Authority.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Chedester". The signature is fluid and cursive, with a large initial "S" and "C".

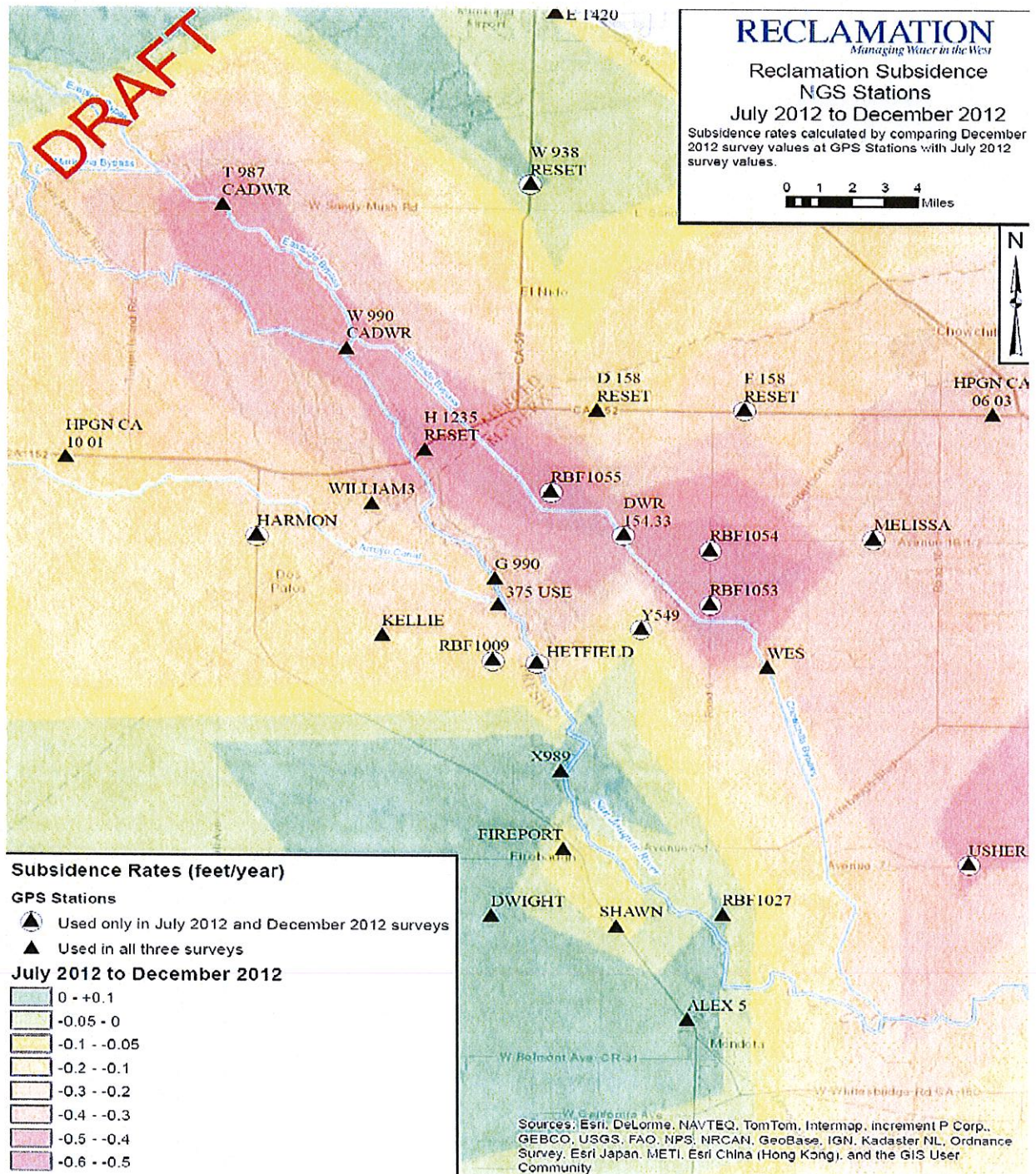
Steve Chedester,  
Executive Director



Charles R. Hoppin, Chairman

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**ATTACHMENT 1**

