

James J. Stevinson  
A CORPORATION  
P.O. Box 818  
NEWMAN, CALIFORNIA 95360

LSJRSD.0008

Robert D. Kelley, President

Re: Bay-Delta Plan & SED

July 17, 2018

Dear Members of State Water Resource Control Board,

I am from a 6<sup>th</sup> generation California farming family and am writing on behalf of the landowners in the Stevinson, California and also as Chairman of Merced Sub-Basin GSA. We are located at the confluences of the Merced and San Joaquin Rivers. Collectively we farm approximately 13,000 acres of irrigated land, including the town of Stevinson, a disadvantaged community. My ancestor, James J. Stevinson, built an irrigation canal 26 miles in 1890. Our lands have received surface water 120 years. Our lands receive over 30,000 acre feet of water from Merced Irrigation District. In addition, we provide surface water to some thousands of acres of adjacent wetland habitat. The source of this water is the Merced River watershed. In addition, we supplement with 10,000 AF of groundwater. We rely on the conjunctive use of groundwater and surface water. We are increasingly becoming more efficient with our application of water as the scarcity of this resource and economics demand. Our area has not encountered the “undesirable results” as outlined by SGMA yet. But these increasing efficiencies decrease recharge and make efforts toward groundwater sustainability more difficult. Absent direct surface water use and its recharge, the only way to become sustainable is fallowing land.

The Bay-Delta Plan and a Final Substitute Environmental Document (SED) released by the State Water Board on July 6, 2018 will most certainly decrease available surface water and have devastating effects on the groundwater basin in the Merced County. As you know the recently passed groundwater sustainability legislation of 2014 requires groundwater users to develop and implement sustainable groundwater plans by the year 2020 or 2022 depending on the basin. The legislation requires groundwater use to become sustainable in 20 years. Just the implementation of this legislation will significantly alter acreage under cultivation in the San Joaquin Valley. Many acres of ground have come under irrigation solely on the basis of use of groundwater. These lands are certainly subject to fallowing. SGMA will address this. However, this proposal affects lands with historical surface water rights. As drafted this plan if implemented, will increase fallowing and directly affect all the related industries and jobs. Merced County is already experiencing high unemployment and continues to see significant numbers of people below the poverty level. This proposal will only make this situation worse.

Past efforts to release additional surface water have not reversed the long-term decline of salmon populations. Yet the effects of depredation of non-native fish species, drought and temperature changes resulting from climate change continue to have a significant role in this process. What is the effect of fish decline resulting from these other factors? The causes for this “decline” appear to be unclear. What is clear is the impact of fallowing ground and loss of agriculture and jobs that will result from this proposed action. We know fallowing will happen, but do we know this proposed increase of water from storage will reverse declining salmon populations? No, we don't. In our situation to have less surface water will fallow ground, decrease wetland habitat and the species that occupy it. Don't we all deserve the same consideration of protection as the salmon?

The proposal deeply resonates with the growers of our District. In short, it undermines efforts to secure groundwater sustainability, is unequal in application, and will significantly distress our area. Farmers are stewards of the land, it is our duty to preserve both our natural resources and our farms for future generations. The State Water Board's plan would seriously undermine our efforts.

Sincerely,



Robert D. Kelley,  
6<sup>th</sup> Generation Family Farmer and Chairman of Merced Sub-Basin GSA

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**From:** Bob Kelley <rdk@jjsranch.com>  
**Sent:** Wednesday, July 18, 2018 4:36 PM  
**To:** LSJR-SD-Comments@waterboards.ca.gov; WQCP1Comments  
**Cc:** assemblymember.Gray@assembly.ca.gov; Kiriakou, Lacey; Kelley, Kevin F.  
**Subject:** FW: Bay-Delta Plan and a Final Substitute Environmental Document (SED)  
**Attachments:** Bay Delta SED ltr w receipt name subject071818.pdf

CLEANED comment letter with recipient name and subject – replaces letter sent 7/17/18 at 6:07 pm  
Thank you in advance for comment consideration

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**Subject:** Bay-Delta Plan and a Final Substitute Environmental Document (SED)

Please see Letter of comment on Bay-Delta Plan and a Final Substitute Environmental Document (SED)

Bob Kelley  
6<sup>th</sup> Generation Family Farmer and Chairman of Merced Sub-Basin GSA