

Merced County Farm Bureau



July 27, 2018

California State Water Board
Chairwoman Felicia Marcus
CalEPA Headquarters Building
1001 I Street
Sacramento, CA 95814

RE: Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin
Delta Estuary and final Substitute Environmental Document

Dear Chairwoman Marcus,

On behalf of a highly impacted community within the San Joaquin Valley, we appreciate the opportunity to comment on the Water Quality Control Plan for the San Francisco/Sacramento-San Joaquin Delta Estuary (Bay Delta Plan) and Final Substitute Environmental Document (Final SED). Merced County Farm Bureau is the largest agricultural advocacy organization in Merced County and actively represents approximately 1,000 family farms, ranches and dairies. Although we are an organization based around agriculture, we also have a strong mission in the area of families, communities and the well-being and economic development of Merced County.

December of 2016 brought the California State Water Resources Control Board (SWRCB) to the Art Kamanger Center at the Merced Theatre to hear the implications that the Bay Delta Plan would have on our community. Leaders and individuals from across the county, not solely agricultural, spoke on the topic and ramifications that we would endure under the Board's draconian proposal. Those in support of the project consisted of SWRCB board members, staff and a few individuals from outside of Merced County. At this hearing, and the similar hearings held in Stanislaus and San Joaquin counties, there were over 6,000 comments compiled, yet the staff and directors of SWRCB have elected to make no substantive changes to their environmental documents and regulatory proposal. Projected economic impacts to our community vary from \$751 million per year to \$1.3 billion per year according to a study done by our irrigation district.

We are beyond frustrated with your decisions, as the reviewers of these comments will not see the impacts to this community. You will not see the businesses that leave, the schools that have to rely on bottled water, nor the fallowed ground that would normally produce a safe and reliable food supply. Merced County is officially designated as a disadvantaged community. As you send fresh surface water to aid in flows to help approximately 1,000 anadromous fish, you are simultaneously placing a community without fresh drinking water. Our local water purveyors, Merced Irrigation District (MID), has provided SWRCB with a workable plan to help increase the fish population, yet that plan been ignored and discounted countless times through discussion and

document review. How can SWRCB directors and staff disregard this and propose that flows alone will be the saving grace that will benefit fish? SWRCB has used third-party calls for even more water in defense of its plan; without addressing other stresses on fish, however, whether it is 30%, 40% or 60%, the SWRCB's unimpaired flow proposal is unbalanced, unlikely to achieve its end and, therefore, *unreasonable*.

While unimpaired flows are not the answer, a plan that has functional flows and adequately aids fish while supplying surface water to the community and agriculture is a more effective and reasonable alternative offered in MID's S.A.F.E. Plan. In addition, proper improvement to fish habitat and control of salmon predators are fundamental complements to a functional flows approach. We urge you to not adopt the proposal staff has developed and allow a logical approach to be used.

Should the SWRCB persist with adoption of its proposal, an inevitable consequence is that the parties spend years in court with no progress on fish. In addition, this action would force the families in our communities, throughout the state and nation, to turn to more costly and unsustainably produced imports to replace the products we have taken for granted in our local stores and produce aisles. Consumers want a local food source and to know their growers, but this proposal will work directly against that desire. Products grown in the San Joaquin Valley are not primarily produced in other US states, but rather abroad. We consistently produce a safe food supply and the only replacements will be produced under far lesser food quality standards, practices and labor conditions.

Although the SWRCB refuses to admit to the public that the California WaterFix or Sustainable Groundwater Management Act are directly connected to these proposals, for anyone who examines these together, it is quite obvious that the two proposals are directly related. We find it astonishing that to offset the loss of water due to unimpaired flows, the SWRCB suggests that senior, upstream water rights holders and growers should fallow land or make losses by tapping groundwater. The non-coincidental timing of Metropolitan Water District's funding of WaterFix and the amount of water to be flushed from the San Joaquin River tributaries and the Sacramento River is not lost on those observing the Board's process closely—and, if it comes to a battle in the courts, they will not be lost there either.

Again we appreciate the opportunity to comment on the SWRCB current Bay Delta Plan and SED Report. Should you have questions or concerns on our comments above, please contact me at your convenience.

Sincerely,



Breanne Ramos
Executive Director

From: Breanne Ramos <bramos@mercedfarmbureau.org>
Sent: Friday, July 27, 2018 11:21 AM
To: LSJR-SD-Comments@waterboards.ca.gov; WQCP1Comments
Cc: ginouiii@sbcglobal.net; Joe Sansoni; 'Wiebren Jonkman'; 'Eric Harcksen'; 'Dadamo, Dorene@Waterboards'; 'Pareira, Lloyd'; 'McDaniel, Daron'; james.brown@countyofmerced.com; 'Dietz, Stephanie'; Murphy, Mike; 'John Sweigard'; Jjohansson@CFBF.com; 'Richard Matteis'; Adam.Gray@asm.ca.gov; 'Heller, Ryan'
Subject: Comment Letter - Revisions to Proposed Bay-Delta Plan Amendments
Attachments: MCFB Final Bay Delta Plan Comments - 07272018.pdf
Categories: Red Category

Good Morning,

On behalf of Merced County Farm Bureau Board of Directors, please accept our comment letter for the Proposed Bay-Delta Plan Amendments comment period. Should you have any questions or concerns about the attached, please contact me at your convenience.

All my best,

Breanne Ramos
Executive Director
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