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Comment Letter-2016 Bay-Delta Plan Amendment & SED

California State Water Resources Control Board:

My name is Dr. Robert Cherenson. I am a dairy veterinarian with Lander Veterinary Clinic (LVC) in Turlock, Stanislaus County. Established in 1950, LVC employs 16 veterinarians and 14 additional support staff. We provide service to approximately 150 dairy farms as well as numerous beef ranchers and small ruminant flock owners. We provide formal educational externship opportunities for hundreds of veterinary students from throughout California, the US and the world. A number of the doctors serve on national veterinary and agricultural boards.

I am writing to express my opposition to the proposed *Draft Substitute Environmental Document (SED) in support of Phase I of the Bay-Delta Plan.*

**Our Region**

To begin, the 5 county region which will be impacted in an extremely negative manner includes: Stanislaus, Merced, San Joaquin, Tuolumne, Mariposa and Calaveras counties. With a population of 1,600,000 we are not insignificant.

We are amongst the most productive farming counties in the US, and certainly in the world. We have thousands of jobs supporting agriculture, as well as food processing. We have schools, hospitals, universities and retail and service businesses. We serve as a major bedroom community for Bay Area commuters. Should the proposed SED be implemented, there is not a single individual in the region that will NOT be affected to some degree in a negative manner.

**Continuous, beneficial and responsible use of water**

Turlock Irrigation District (TID) and Modesto Irrigation District (MID) were created in 1887 under the Wright Act and were amongst the first irrigation districts in the State of California; and thus granted pre-1914 appropriative water rights.

They have utilized the water continuously in a most sustainable, beneficial, efficient and responsible manner. They are leaders and innovators in the management of irrigation water.

They continue to find creative solutions to eliminate water waste, balance the needs of agriculture and urban use, and provide for the needs of the environment and recreational users. They effectively deliver water and power to the districts.

If one studies annual mean and median rainfall in this region, it becomes clear that in 5/10 years, rainfall is below mean, in 2/10 rainfall is average, and in 3/10 years it is above average. This is why dams were constructed to attempt to hold three years of water.

The proposal to increase river flows to mimic 40% of unimpaired flows along these rivers (Tuolumne, Stanislaus and Merced) from February 1 to June 30 annually for fish and salinity control in the Delta is completely unreasonable and unacceptable. This is especially so, as there are currently no dry year exemptions.

### **Differentiating conservation from preservation**

I hope the board (SWRCB) understands the difference between conservation and preservation. Conservation focuses on needs of people versus the needs of nature by providing for the sustainable needs and interests of human beings.

Preservation places the needs of the environment as the priority and emphasizes that natural resources should not be consumed by humans and should instead be maintained in their pristine form.

Unfortunately, it is simply too late to turn back the clock in the Central Valley to a preservationist way of thinking (and acting). There are too many people, too many businesses and too much infrastructure. There has been too much alteration of the natural water ways in the Delta to simply hope to recreate the natural environment of the 1800's. The non-native predatory bass are here and embedded. The decision to remain pristine should have been made over 100 years ago.

The grizzly bear has been gone from California for over 100 years. The population centers contain millions of people with completely altered environments that will not support mountain lions, bears, antelope and elk. Simply, the population of California has grown too large to support the preservationist vision.

Unless the human population is made smaller, we must accept the given reality. Increasing river flows will not accomplish the objectives of the SED. The SED itself clearly expresses the following: *"These recent data serve as an important indicator that high Vernalis flow, by itself, cannot guarantee strong downstream migrant survival."* And, *"Although the statistical basis for this decline is not yet compelling, all review panel members were struck by the coincident decline across independent CWT release groups at four different flow groupings."*

### **A vision of our region without access to sustainable and abundant surface water**

If the proposed SED is implemented, and the Sustainable Groundwater Management Act (SGMA) is implemented, while the population of the region continues to grow and the demand for food increases, what will our region look like?

I personally envision a dystopian nightmare. Desertification (like the Owens Valley), increased dust, decreasing assessed property values, decreased county tax revenue, increased unemployment, more poverty, increased urbanization (like the Inland Empire in SoCal), more traffic, more pollution, increased temperature (agricultural lands cool the air), more commuters to the Bay Area as homes eventually replace farmland, increased food costs, more greenhouse gas production.

**Volatility, disruption, uncertainty, government over-reach, water grab, desertification, disingenuous, sadness, tragedy, frustration, anger, incompetence.**

These are the words and feelings that come to my mind when examining the proposed SED.

In closing, as a citizen, employer and stakeholder in the proposed zone of devastation if the SED is approved, I want to make clear that I do not support its implementation. The unintended consequences will be enormous, the desired outcomes are unlikely to result and the complete disruption of the region will create havoc and chaos.

Respectfully submitted,

Robert. B. Cherson, DVM