

BALLICO-CORTEZ WATER DISTRICT

12714 CORTEZ AVENUE, TURLOCK, CA 95380

December 20, 2016

Public Comment
2016 Bay-Delta Plan Amendment & SED
Deadline: 3/17/17 12:00 noon

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814-0100



Dear Ms. Townsend

Enclosed please find the Resolution from Ballico-Cortez Water District for the Bay Delta Plan, Phase 1 Revised Draft SED.

If you have any questions please call (209) 632 8676 or email me at yotmyhat@yahoo.com.

A handwritten signature in blue ink that reads "Dennis Yotsuya".

Dennis Yotsuya

Ballico Cortez Water District, Treasurer

BALLICO-CORTEZ WATER DISTRICT RESOLUTION

For State Water Resources Control Board's Bay-Delta Plan, Phase 1 Revised Draft SED

Whereas, the State Water Resources Control Board's Bay-Delta Plan, Phase 1 Draft Substitute Environmental Document (SED) issued in December 2012 proposed to require the Stanislaus, Tuolumne, and Merced rivers release 35 percent of unimpaired flows from February to June each year for environmental benefit; and

Whereas, the State Water Resources Control Board, after a two-day hearing in March 2013 regarding the adequacy of the SED, decided to revise the analyses and recommendations provided in the Draft SED, with the ultimate intent of bringing a Final SED and to its Board for adoption at a date to be determined; and

Whereas, a revised Draft SED was issued on September 15, 2016 and is currently being circulated for public comment; and

Whereas, Governor Edmund G. Brown, Jr. declared on January 17, 2014 California to be in a state of emergency due to an unprecedented three-year drought; and

Whereas, flows described in the SED will create "significant and unavoidable" lasting impacts that will harm the socioeconomic welfare of those within Stanislaus, San Joaquin and Merced counties; and

Whereas, water supply impacts of flows described in the SED include the loss of hundreds of thousands of acre-feet of surface water that is used to keep agriculture—the region's economic engine—stable. This loss of water would result in the fallowing of some of the most prime farmland in California; and

Whereas, if the SED's unimpaired flows were in effect in 2015, in addition to already-incurred impacts from the fourth year of a drought, the economic impacts of the SED would have included \$1.6 billion in economic output loss, \$167 million farm-gate revenue loss, \$330 million in labor income loss, and 6,576 jobs would have been lost, all within the region served by Modesto and Turlock irrigation districts; and

Whereas, groundwater impacts of flows described in the SED include increased groundwater pumping at a time when California is working to implement the landmark Sustainable Groundwater Management Act. Impacts from flow increases described in the SED include a severely hampered ability to conjunctively use surface water on farms to provide adequate groundwater recharge; and

Whereas, growers within the Ballico-Cortez Water District, approximately 160 farms on 7000 acres, many of which also live in the District, rely solely upon groundwater for their water supplies. Groundwater in the basin has historically been recharged to a great extent from surface water irrigation within the Turlock Irrigation District. As a result of reduced surface water supplies within the Turlock Irrigation District, water supplies within Ballico-Cortez Water District and other areas to the east, that do not have access to surface water supplies, will also be significantly impacted; and

Whereas, power impacts of flows described in the SED include public power agencies being resigned to generating more hydropower at a time of low demand, meaning less water is available to generate hydropower in summer when power demand is at its peak. This has economic impacts to public power agencies, and such impacts bear a direct relation to customer electric rates; and

Whereas, growers within Ballico-Cortez Water District also fall within the Turlock Irrigation District's electrical service area, the increased electrical costs resulting from reduced hydropower generation, at the same time as reduced groundwater supplies, will doubly impact Ballico-Cortez growers who have no other choice than to pump groundwater for their supply; and

Whereas, there is reasonable and significant doubt that the flows described in the SED will benefit native fish populations or promote ecosystem restoration. The SED focuses narrowly on flows as a solution to environmental concerns while ignoring non-flow alternatives such as predator suppression and fish habitat restoration. Such non-flow management measures are often less costly and more effective; and

BE IT THEREFORE RESOLVED, the State Water Resources Control Board should pursue a comprehensive solution which takes into account, rather than dismisses, the impacts listed above. This solution must prioritize non-flow measures to protect native fish species, such as predation reduction programs, before requiring flow increases that would threaten the economic vitality of our region's counties, cities and small family farms.

Resolution was approved unanimously by the Board of Directors.

Certification

I, the Secretary to the Board of Directors, certify that the above resolution was adopted at a regular meeting of the Board of Directors of the Ballico-Cortez Water District held on November 15, 2016.


