



March 17, 2017

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

Re: *Draft Substitute Environmental Document (SED) to the Bay-Delta Plan*

Dear Members of the State Water Resources Board:

My family has been growing fruit and nut tree crops in Stanislaus County for over 100 years. Our irrigation water comes from the Modesto and Turlock Irrigation Districts and is applied via drip irrigation. Our operation is Global GAP certified sustainable. That means that we can tell our customers we are doing everything possible to ensure that our farm will be in business 100 years from now.

The draft SED was largely developed in isolation, as offers for assistance and data from the local irrigation districts and related agencies have been ignored. Despite scientific data that shows the validity of alternative approaches, the current SED promotes the notion of the “spring unimpaired flow approach” as the only management vehicle to address fish and wildlife beneficial uses and salinity control.

The current recommendation of the SED will have a devastating effect on my farm and our community as it will increase pumping of ground water and continue the degradation of drinking water quality. Long term, the current SED means that our farm would no longer be sustainable.

The decision before the board is whether to adopt the SED and spend years and millions of dollars defending the SED OR constructively work with stakeholders to find a solution.

It is in everyone’s best interest to pursue a framework for mediated global settlement that is based upon science. This means that global solutions must include:

- Functional flows – not unimpaired flows;
- Dry year relief for irrigation districts and municipalities;
- Non-flow measures such as predation, aquatic weed control and habitat restoration;
- Additional storage, both above & below ground, on & off stream;
- Integration of technology into the aging canal infrastructure;
- Multi species management; and
- Recognition of the regions reliance on ground water

Sincerely,

Paul J. Van Konyneburg