



December 15, 2016

Felicia Marcus, Chair  
State Water Resources Control Board  
PO Box 100  
Sacramento CA 95812-0100

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



RE: Comment Letter – 2016 Bay-Delta Plan Amendment & SED

Johnson Farms is a family owned and operated almond farm and huller/sheller located in Denair. The Johnson Family has been farming in the local community for over 100 years. Tim and Tom Johnson are the fourth generation in their family to operate the family business. Their father, Roy Johnson, who is approaching his 80<sup>th</sup> birthday, still comes to the office every day to check in. Roy has been farming all of his life, and has a wealth of practical knowledge that still benefits the family farm today.

All of us at Johnson Farms are extremely concerned with your Draft Revised Substitute Environmental Document (SED) and its proposed unimpaired flow requirements for the Merced, Tuolumne and Stanislaus Rivers. As you know, California produces 50% of the U.S.'s fruits, nuts and vegetables, much of which come from the Central Valley. Your board's proposal, will not only severely impact our local region and its communities, it will have far reaching impacts on families across the Country. In the U.S. less than 10% of a family's income is spent on food, compared to some developing countries where 75% of a family's income is spent on food. This plan, as proposed will shift food production to other regions of the world, greatly reducing job opportunities in our area, collapse our communities, pose greater challenges to our schools, particularly those serving economically disadvantaged children, and increase food prices in the U.S.

Equally concerning is, the SED doesn't account for the damaging effects it will have on groundwater quality and sustainability. Our local water agencies and farming communities are diligently working to achieve groundwater sustainability goals outlined in the Sustainable Groundwater Management Act (SGMA). If implemented, the SED will be the direct cause of groundwater reduction in our region, making it nearly impossible to achieve the State Mandated Groundwater Sustainability Act, further impacting our communities negatively. We are deeply troubled that the SED lacks any proposal to address what you label as "significant, but unavoidable impacts" to our region. This approach by your board, is simply inexcusable and inequitable to our communities.

Currently we farm 3,000 acres, and in our sheller we process approximately 21 million pounds of almonds. We employ 18 full time employees and during harvest we employ 40 additional people, many of whom return year after year. We believe in supporting our community to which has been so supportive to us. We provide financial support to scholarship funds, FFA and 4H programs, and youth organizations targeting disadvantaged children. We are stewards of the land, and we believe in a strong viable and balanced ecosystem. We are incredibly resourceful and are continuously innovating new

ways to conserve our resources. However, if the SED is to be implemented as currently proposed, we estimate a minimum 25% of our land will need to be fallowed. We are not alone in this, all of our growers will have to do the same. In our network of customers alone, nearly 2,200 acres of almond orchards will have to be fallowed. We will be forced to lay off long time employees, who we consider family. Future generations of the Johnson Family will not be able to continue the heritage of farming and supporting its community as the family has done for so many years.

We urge you and your board to abandon the proposed SED and begin meaningful dialogue, with the mindset of reaching balanced solutions to preserve the vital resources our communities are dependent upon. We urge the board to seriously consider and pursue alternative options to flow and carry over controls, such as continued restoration of habitats and controlling non-native predation, to which peer reviewed science tells us will accomplish positive results for the salmon populations.

We thank you for time and consideration and look forward to your response.

Sincerely,



Mike Curry  
Johnson Farms

Cc:

Governor Jerry Brown  
Senator Dianne Feinstein  
Senator Barbara Boxer  
Congressman Jeff Denham  
State Senator Tom Berryhill  
State Assemblyman Heath Flora  
Frances Spivy-Weber, Vice Chair  
Tam Doduc, Board Member  
Steven Moore, Board Member  
Dorene D'Adamo, Board Member